

Bourne Lent Asset Management, Inc.

Form ADV Part 2A – Disclosure Brochure

Effective: October 9, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Bourne Lent Asset Management, Inc. (“Bourne Lent” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (845) 855-1590 or by email at judy@bournelent.com.

Bourne Lent is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Bourne Lent to assist you in determining whether to retain the Advisor.

Additional information about Bourne Lent and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 111114.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Bourne Lent. For convenience, the Advisor has combined these documents into a single disclosure document.

Bourne Lent believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Bourne Lent encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes to this Disclosure Brochure since its last filing and distribution to clients.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 111114. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (845) 855-1590 or by email at judy@bournelent.com.

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Item 4 – Advisory Services

A. Firm Information

Bourne Lent Asset Management, Inc. ("Bourne Lent" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The Advisor is organized as a corporation under the laws of the State of New Jersey. The Advisor has been in business since 1983. The original name of the firm was Bourne Management Inc. In 1998, Bourne Management Inc. invested in Bourne Fissell & Stenstrom, LLC which was closed in June of 2000. In July of 2000, the name of the firm was changed to Bourne Stenstrom Capital Management, Inc. and in 2008 the firm's name was changed to, Bourne Stenstrom Lent Asset Management, Inc. In 2015, the Firm's name was changed to Bourne Lent Asset Management, Inc. Bourne Lent is owned and operated by Donald Bourne (President) and John Lent (Portfolio Manager, Secretary and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Bourne Lent.

B. Advisory Services Offered

Bourne Lent offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, businesses and municipal entities (each referred to as a "Client").

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Bourne Lent's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Bourne Lent provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Bourne Lent works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Bourne Lent will then construct an investment portfolio, primarily consisting of individual equities and individual bonds. The Advisor may also utilize exchange-traded funds ("ETFs") or mutual funds to achieve the Client's investment goals. to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client's legacy investments based on portfolio fit and/or tax considerations.

Bourne Lent's investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Bourne Lent will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Bourne Lent evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Bourne Lent may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Bourne Lent may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Bourne Lent may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Retirement Accounts – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts ("IRAs"), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another

IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

At no time will Bourne Lent accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

C. Client Account Management

Prior to engaging Bourne Lent to provide investment advisory services, each Client is required to enter into a written agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Bourne Lent, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Bourne Lent will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Bourne Lent will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Bourne Lent will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

Bourne Lent does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Bourne Lent.

E. Assets Under Management

As of December 31, 2023, Bourne Lent manages \$ 285,467,751 in Client assets, \$283,456,623 of which are managed on a discretionary basis and \$2,011,128 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, either in advance or at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the calendar quarter, or prior calendar quarter. Investment advisory fees are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
Up to \$2,000,000	1.00%
Over \$2,000,000	0.60%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. Certain legacy clients may be billed under a different fee schedule. The Client's fees will take into consideration the aggregate assets under

management with the Advisor. All securities held in accounts managed by Bourne Lent will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning or end of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Bourne Lent at the end of the prior quarter, or each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by Bourne Lent to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Bourne Lent, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by Bourne Lent are separate and distinct from these custody and execution fees.

In addition, all fees paid to Bourne Lent for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Bourne Lent, but would not receive the services provided by Bourne Lent which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Bourne Lent to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

Bourne Lent may be compensated for its investment management services either in advance of the quarter in which services are rendered or at the end of the quarter after services are provided. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. For services paid in advance, upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Bourne Lent does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

Bourne Lent does not charge performance-based fees for its investment advisory services. The fees charged by Bourne Lent are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Bourne Lent does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Bourne Lent offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, businesses and municipal entities. Bourne Lent generally requires a minimum relationship size of \$500,000 to effectively implement its investment process, which may be waived at the Advisor's sole discretion.

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

A. Methods of Analysis

Bourne Lent primarily employs a fundamental analysis in developing investment strategies for its Clients. Research and analysis from Bourne Lent are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Bourne Lent generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Bourne Lent will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Bourne Lent may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Bourne Lent will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Fixed Income Risks

Fixed Income securities are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Bourne Lent or its management persons. Bourne Lent values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 111114.

Item 10 – Other Financial Industry Activities and Affiliations

The sole business of Bourne Lent and its management persons is to provide investment advisory services to its Clients. Neither Bourne Lent nor its Advisory Persons are involved in other business endeavors. Bourne Lent does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

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

A. Code of Ethics

Bourne Lent has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Bourne Lent ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. Bourne Lent and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Bourne Lent's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (845) 855-1590 or via email at judy@bournelent.com.

B. Personal Trading with Material Interest

Bourne Lent allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Bourne Lent does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Bourne Lent does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Bourne Lent allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Bourne Lent requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Bourne Lent allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Bourne Lent, or any Supervised Person of Bourne Lent, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Bourne Lent does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Bourne Lent to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Bourne Lent does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Bourne Lent does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Bourne Lent. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Bourne Lent may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

Bourne Lent will generally recommend that Clients establish their account[s] at Fidelity Clearing and Custody Solutions and related divisions of Fidelity Investments, Inc. (collectively "Fidelity"), or Raymond James Financial, Inc. ("Raymond James"), each a FINRA-registered broker-dealer and members SIPC. Fidelity or Raymond James will serve as the Client's "qualified custodian". Bourne Lent maintains institutional relationships with Fidelity and Raymond James whereby the Advisor receives economic benefits from Fidelity or Raymond James. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Bourne Lent does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - Bourne Lent does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Bourne Lent will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Bourne Lent will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Bourne Lent will execute its transactions through the Custodian as authorized by the Client. Bourne Lent may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by the advisory persons of Bourne Lent, under the supervision of John Lent, Chief Compliance Officer of Bourne Lent. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Bourne Lent if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Bourne Lent

Bourne Lent is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. Bourne Lent does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Bourne Lent may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Bourne Lent may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platforms

Raymond James – Bourne Lent has established institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. Access to the Raymond James platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Raymond James. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Fidelity – As noted in item 12, Bourne Lent has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. As part of the arrangement, Fidelity also makes available to the Advisor, at no additional charge to the Advisor, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies. The Advisor may also receive additional services and support from Fidelity. As a result of receiving such services for no additional cost, the Advisor may have an incentive to continue to use or expand the use of Fidelity's services. The Advisor examined this conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of the Advisor's Clients and satisfies its Client obligations, including its duty to seek best execution. Please see Item 12 above.

The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services. In addition, Fidelity has provided the Advisor with financial support in the launch of the Advisor and reimbursements for various third-party service providers.

B. Compensation for Client Referrals

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

Item 15 – Custody

Bourne Lent does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Bourne Lent to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Bourne Lent to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

Item 16 – Investment Discretion

Bourne Lent generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Bourne Lent. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Bourne Lent will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Bourne Lent may accept the authority to vote Client's securities (i.e., proxies) on their behalf. When Bourne Lent accepts such responsibility, it will cast proxy votes in a manner it believes is consistent with the best interest of its Clients. At any time Clients may contact Bourne Lent to request information about how the Advisor voted proxies for that Client's securities.

A brief summary of Bourne Lent's proxy voting policies and procedures is as follows: Unless there is an unusual circumstance or an extraordinary proposal on the ballot, the shares will be voted with the management. The Advisor believes in the management of the companies that the Advisor chooses for investments and usually vote the shares the Advisor controls with the management's guidance. Should there be such occurrence where the shares are not voted with management, the principals of the firm will agree as to what the vote by Bourne Lent will be.

Where Bourne Lent is responsible for voting proxies on behalf of a Client, the Client cannot direct the Advisor's vote on a particular solicitation. The Client, however, can revoke Bourne Lent' authority to vote proxies. In situations where there may be a conflict of interest in the voting of proxies due to business or personal relationships that Bourne Lent maintains with persons having an interest in the outcome of certain votes, the Advisor will take appropriate steps, to ensure that proxy voting decisions are made in what it believes is the best interest of its Clients and are not the product of any such conflict.

Item 18 – Financial Information

Neither Bourne Lent, nor its management, have any adverse financial situations that would reasonably impair the ability of Bourne Lent to meet all obligations to its Clients. Neither Bourne Lent, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Bourne Lent is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

Form ADV Part 2B – Brochure Supplement

for

**Donald W. Bourne
President**

Effective: October XX, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Donald W. Bourne (CRD# 4368990) in addition to the information contained in the Bourne Lent Asset Management, Inc. (“Bourne Lent” or the “Advisor”, CRD# 111114) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Bourne Lent Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (845) 855-1590 or by email at judy@bournelent.com.

Additional information about Mr. Bourne is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4368990.

Item 2 – Educational Background and Business Experience

Donald W. Bourne, born in 1962, is dedicated to advising Clients of Bourne Lent as the President. Mr. Bourne earned a degree in Economics from Allegheny College in 1985. Mr. Bourne Additional information regarding Mr. Bourne's employment history is included below.

Employment History:

President, Bourne Lent Asset Management, Inc.	01/1991 to Present
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Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Bourne. Mr. Bourne has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Bourne.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Bourne.***

However, we do encourage you to independently view the background of Mr. Bourne on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4368990.

Item 4 – Other Business Activities

Mr. Bourne is dedicated to the investment advisory activities of Bourne Lent's Clients. Mr. Bourne does not have any other business activities.

Item 5 – Additional Compensation

Mr. Bourne is dedicated to the investment advisory activities of Bourne Lent's Clients. Mr. Bourne does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Bourne serves as the President of Bourne Lent and is supervised by John Lent, the Chief Compliance Officer. Lent can be reached at (845) 855-1590.

Bourne Lent has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bourne Lent. Further, Bourne Lent is subject to regulatory oversight by various agencies. These agencies require registration by Bourne Lent and its Supervised Persons. As a registered entity, Bourne Lent is subject to examinations by regulators, which may be announced or unannounced. Bourne Lent is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**John J. Lent
Portfolio Manager, Secretary and Chief Compliance Officer**

Effective: October XX, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of John J. Lent (CRD# 2224794) in addition to the information contained in the Bourne Lent Asset Management, Inc. (“Bourne Lent” or the “Advisor”, CRD# 111114) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Bourne Lent Disclosure Brochure or this Brochure Supplement, please contact us at (845) 855-1590 or by email at judy@bournelent.com.

Additional information about Mr. Lent is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2224794.

Item 2 – Educational Background and Business Experience

John J. Lent, born in 1946, is dedicated to advising Clients of Bourne Lent as a Portfolio Manager, Secretary and Chief Compliance Officer. Mr. Lent earned an MBA from Fairleigh Dickinson in 1976 Mr. Lent also earned a bachelors degree from Dayton College in 1968. Additional information regarding Mr. Lent's employment history is included below.

Employment History:

Portfolio Manager, Secretary and Chief Compliance Officer, Bourne Lent Asset Management, Inc.	06/2006 to Present
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Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Lent. Mr. Lent has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Lent.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Lent.***

However, we do encourage you to independently view the background of Mr. Lent on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2224794.

Item 4 – Other Business Activities

Mr. Lent is dedicated to the investment advisory activities of Bourne Lent's Clients. Mr. Lent does not have any other business activities.

Item 5 – Additional Compensation

Mr. Lent is dedicated to the investment advisory activities of Bourne Lent's Clients. Mr. Lent does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Lent serves as a Portfolio Manager, Secretary and Chief Compliance Officer of Bourne Lent. Mr. Lent can be reached at (845) 855-1590.

Bourne Lent has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bourne Lent. Further, Bourne Lent is subject to regulatory oversight by various agencies. These agencies require registration by Bourne Lent and its Supervised Persons. As a registered entity, Bourne Lent is subject to examinations by regulators, which may be announced or unannounced. Bourne Lent is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Kevin A. Stickle
Investment Advisor Representative**

Effective: October XX, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Kevin A. Stickle (CRD# 7216503) in addition to the information contained in the Bourne Lent Asset Management, Inc. (“Bourne Lent” or the “Advisor”, CRD# 111114) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Bourne Lent Disclosure Brochure or this Brochure Supplement, please contact us at (845) 855-1590 or by email at judy@bournelent.com.

Additional information about Mr. Stickle is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7216503.

Item 2 – Educational Background and Business Experience

Kevin A. Stickle, born in 1996, is dedicated to advising Clients of Bourne Lent as an Investment Advisor Representative. Mr. Stickle earned a Bachelor's Degree from University of Arizona in 2019. Additional information regarding Mr. Stickle's employment history is included below.

Employment History:

Investment Advisor Representative, Bourne Lent Asset Management, Inc.	09/2023 to Present
Account Executive, The Millennium Alliance	07/2022 to 05/2023
Operations Representative, Charles Schwab	03/2020 to 05/2022
Sales Agent, New York Life	10/2019 to 03/2020
Lifeguard, Borough Of Monmouth Beach	05/2011 to 09/2019

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Stickle. Mr. Stickle has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Stickle.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Stickle.***

However, we do encourage you to independently view the background of Mr. Stickle on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7216503.

Item 4 – Other Business Activities

Mr. Stickle is dedicated to the investment advisory activities of Bourne Lent's Clients. Mr. Stickle does not have any other business activities.

Item 5 – Additional Compensation

Mr. Stickle is dedicated to the investment advisory activities of Bourne Lent's Clients. Mr. Stickle does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Stickle serves as an Investment Advisor Representative of Bourne Lent and is supervised by John Lent, the Chief Compliance Officer. Mr. Lent can be reached at (845) 855-1590.

Bourne Lent has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bourne Lent. Further, Bourne Lent is subject to regulatory oversight by various agencies. These agencies require registration by Bourne Lent and its Supervised Persons. As a registered entity, Bourne Lent is subject to examinations by regulators, which may be announced or unannounced. Bourne Lent is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: October XX, 2024

Our Commitment to You

Bourne Lent Asset Management, Inc. ("Bourne Lent" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Bourne Lent (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Bourne Lent does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Bourne Lent does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Bourne Lent or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients Bourne Lent does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (845) 855-1590 or via email at judy@bournelent.com.