



WILLOW GROVE ADVISORS

Form ADV Part 2 A
June 26, 2019

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This brochure provides information about the qualifications and business practices of Willow Grove Advisors, LLC. (CRD# 151993) If

you have any questions about the contents of this brochure, please contact us at (510) 705-1693 or email Keley@WillowGroveAdvisors.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority. Registration does not imply a certain level of skill or training.

Additional information about Willow Grove Advisors also is available on the SEC's website at <http://www.adviserinfo.sec.gov/>

Item 2: Material Changes

Since our last update of Part 2 of Form ADV on 03-29-2019 the following items have been updated:

- Item 4: Advisory Business - Updated to reflect current advisory business and to update assets under management.
- We have increased our assets under management to more than \$110M and as a result we are now under the supervision of the SEC.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Currently, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. If you have any questions about the information in this Brochure or would like to request a copy of the Brochure, please contact us at (510) 705-1693 or email us at Keley@WillowGroveAdvisors.com.

Additional information about Willow Grove Advisors, LLC is also available via the SEC's web site <http://www.adviserinfo.sec.gov/>. The SEC's website also provides information about any persons affiliated with Willow Grove Advisors, LLC who are registered, or are required to be registered, as investment adviser representatives of Willow Grove Advisors, LLC.

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Item 4: Advisory Business

Willow Grove Advisors, LLC (Willow Grove) is a Registered Investment Advisor whose principal owners are Keley R. Petersen and Jeff Petersen and has been in business since 2009.

Willow Grove provides investment advisory services to a broad range of individuals and high net worth individuals for a percentage of assets under management and provides these services on a discretionary basis. Investment advisory services are provided based on the individual needs of a client and stated objectives and guidelines of the account.

Willow Grove strictly provides fee-only investment advice. This means that we do not accept sales commissions for any products that we recommend to our clients. We will act as a fiduciary with a duty to prudently take care of your assets and at all times, we must act in the best interest of our clients.

Willow Grove Investment Management accounts are available to investors with \$500,000 of investable assets.

For all new accounts, Willow Grove will evaluate securities initially held in the portfolio and will work with the client to create a portfolio transition plan which may sell all or periodically sell portions of such securities to the extent that such securities would not be included in Willow Grove's normal portfolio holdings for such account.

The client will be responsible for any tax liabilities that result from any transactions initially and during management of the account. Willow Grove seeks to commence management of an account as soon as practicable after review of the account documentation, acceptance of its appointment as Adviser and transfer of assets to the custodian. The time required to commence management may vary depending on the time required to complete these steps.

Our assets under management are calculated by adding all of the securities portfolios for which we provide continuous and regular supervisory or management services. As of June 26, 2019, Willow Grove manages \$112,102,958 for approximately 80 client relationships.

Item 5: Fees and Compensation

General Information on Fees and Services

Fee Schedule

Diversified Investment Management

For fully Diversified Investment Management accounts where Willow Grove has investment discretion over assets in the account, the fee schedule is as follows:

First \$1 Million 1.10%
Next \$2 Million .85%
Next \$2 Million .70%
Next \$5 Million .55%
Over \$ 10 Million **Negotiable**

These fees are negotiable for all accounts with a market value of \$10 million or greater. The fees stated herein do not apply to “Non-Managed Assets”, if any.

Fees will be automatically debited on a monthly basis from client accounts unless alternative arrangements have been made between the client and Willow Grove. Invoices detailing these fees will be sent to clients simultaneously. Clients will also be notified of the amount of their fee through statements provided by their custodian.

Employees of Willow Grove may be eligible for a discounted fee. Fees are payable monthly in arrears, based on the previous month-end fair market value of each account. The client must consent in advance to direct debiting of their investment account.

For securities where ready valuation information is not available (including but not limited to hedge funds, private placements, illiquid securities and some derivatives) pricing will be undertaken through good faith cooperation between Willow Grove Operations and the manager of the specific security to fairly approximate the security's current value. Willow Grove will also engage third-party pricing agents to price illiquid and hard-to-value securities holdings

We are compensated for our investment advisory services based on a percentage of assets under management. Fees percentages may differ among clients based on a number of factors, including the type and size of the advisory account and the number and range of supplemental advisory and client-related services to be provided. Assets in related accounts may be aggregated to establish the amount on which fees will be based. Our fee schedule shows the maximum percentage charged for each asset range. Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security (Please see Part 12 Brokerage Practices).

Hourly Fees

On occasion, when clients request that we work on specific projects, we will charge an hourly fee of \$400/hour for the services of Keley Peterson and \$250/hour for the services of an Associate.

Additional Fees Charged by Mutual Fund Companies and Separate Account Managers/Sub-Advisers

In addition to our fees, each mutual fund, ETF, Limited Partnership, and Money Manager in which a client's assets may be invested, charges its own management fees and other expenses. Details these fees and expenses can be found in the relevant fund prospectus, Limited Partnership offering memorandum or Money Manager Form ADV Part 2. Copies of mutual fund and ETF prospectuses can be obtained directly from the company or through Willow Grove upon request. Willow Grove will provide copies of offering memoranda for Limited Partnerships and Form ADV Part 2 for money managers.

Item 6: Performance Based Fees and Side-by-Side Comparisons

Willow Grove does not engage in the practice of charging performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7: Types of Clients

Willow Grove provides portfolio management services for individuals and high net worth individuals. Generally, the firm requires a minimum portfolio size of \$500,000, however, on occasion we may accept smaller accounts. Also, we may continue to service existing accounts that fall below the minimum.

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

Investment securities used by our firm include:

- Exchange-listed and over-the counter securities
- Foreign issues
- Warrants
- Corporate, municipal, and US government issued debt securities
- Mutual fund shares
- Options contracts on securities
- ETF's
- Interests in partnerships investing in:
 1. Real estate
 2. Oil and gas interests
 3. Venture capital
 4. Leveraged buyout funds
 5. Asset-backed structured securities
 6. Hedge funds
 7. Pooled investments

Some assets described herein may require a lengthy holding period or be subject to periodic redemption provisions, which may affect the availability and liquidity of funds.

Inherent to the risks of each of these securities is market valuation volatility. Each investment has its own set of risks which may include, but are not limited to economic risk, liquidity risk, market risk, interest rate risk, default risk, inflation risk, reinvestment risk, and legislative risk.

We employ both fundamental and technical methods of investment analysis. Sources of fundamental market and investment analysis include:

- Financial newspapers
- Research materials prepared by others
- Annual reports, prospectuses, filings with the SEC
- Company press releases
- Commercially available financial data
- Valuation and analytical software

Investment strategies typically will focus on the long-term investment horizon. However, investments are analyzed on an ongoing basis and may result in short-term holding periods. Please note that investing in securities involves risk of loss, and many variables, including, but not limited to market and economic fluctuations, may have a substantial negative effect on the value of your securities positions. Clients must be willing to assume these risks.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Willow Grove Advisors or the integrity of its management team.

Willow Grove's management team has not been involved in any legal or disciplinary event and has no information applicable to this Item. Please visit www.advisorinfo.sec.gov at any time to view detailed registration information and any applicable disciplinary history for Willow Grove Advisors.

Item 10: Other Financial Industry Affiliations and Activities

Willow Grove Advisors and our advisory affiliates are not engaged in other financial industry activities and have no other industry affiliations.

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

Willow Grove's Code of Ethics is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940 as well as all applicable laws of the State of California. The Code is based upon the principle that Willow Grove and its employees owe a fiduciary duty to clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm, and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The purpose of Willow Grove's Code of Ethics is to preclude activities that may lead to or give the appearance of conflicts of interest, insider trading, and other forms of prohibited or unethical business conduct. As such, Willow Grove and its employees are prohibited from engaging in fraudulent, deceptive, or manipulative conduct. Willow Grove and its employees have an affirmative duty of utmost good faith to act solely in the best interest of its clients. Willow Grove and its employees do not participate in client transactions

A copy of Willow Grove's Code of Ethics will be provided upon request.

Item 12: Brokerage Practices

Factors in Selecting Brokers and Determining Commissions:

Willow Grove Advisors does not have any affiliation with product sales firms. Generally, our brokerage accounts are held in custody at Fidelity Investments. Specific custodian recommendations may be made to Clients based on their need for such services. Willow Grove recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Willow Grove does not receive fees or commissions from any of these arrangements.

Trade Allocation and Aggregation of Orders:

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

Payment of Custodian's Transaction Charges

Transaction-related fees including but not limited to commissions charged by custodians are generally paid directly from the clients' accounts, unless otherwise specified, based on the agreement between the client and the custodian.

Item 13: Review of Accounts

All accounts will be reviewed periodically, but not less than quarterly by Keley Petersen. The annual review will include an analysis of the asset allocation and portfolio securities in relationship to the client's stated investment policy.

Quarterly, Willow Grove provides clients with a consolidated summary of assets managed by Willow Grove which describes: Current performance data, taxable vs. non-taxable transactions, asset allocation, realized gains/losses, unrealized gains/losses, portfolio holdings, transactions, income & expenses, and strategy updates for alternative investments with current performance data, if available

Item 14: Client Referrals and Other Compensation

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

Willow Grove does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

Willow Grove deducts the advisory fee from the client's accounts with the client's specific pre-approval. Willow Grove does not have custody of our clients' assets.

Fidelity Investments custodies Willow Grove's accounts..

Clients receive monthly statements from the qualified custodian that holds and maintains client's investment assets. We urge our clients to carefully review such statements and compare such official custodial records to the account statements and Quarterly Performance Reports that we provide to our clients. Please notify us immediately of any discrepancies.

Item 16: Investment Discretion

Willow Grove generally has the authority to determine which securities are to be bought or sold and the amounts of the securities to be bought or sold. Willow Grove has engaged the services of Fidelity Brokerage Services and National Financial Services, LLC, together known as Fidelity Investments, for brokerage, clearing, and custodial services.

Willow Grove's discretionary authority may be subject to guidelines and limitations imposed by the client. Such limitations may relate to restrictions on investing in a particular company, industry, geography or security type, or asset class, among others. Willow Grove will endeavor to follow reasonable directions, guidelines, and limitations.

With Willow Grove's consent, clients may include certain assets in accounts for which Willow Grove provides no investment advisory services ("Non-Managed Assets"). Non-Managed Assets are not subject to Willow Grove's Investment Management fees.

Item 17: Voting Client Securities

Willow Grove Advisors will not vote Proxies for securities held in client portfolios. For portfolios subject to ERISA, responsibility for proxy voting will be determined by the plan document. If an account is managed by a money manager/sub adviser, the sub adviser may retain voting authority for that account

Item 18: Financial Information

Willow Grove has no financial commitment that impairs its ability to meet its contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19: Resumes

Keley R. Petersen, President

Keley brings over 32 years of experience in the financial services industry. Prior to Willow Grove Advisors, Keley was with Contango Capital Advisors, where she was a Wealth Manager for the Ultra High Net Worth Client Group. Previously, Keley held the positions of Chief Operating Officer and Senior Investment Consultant at Hewins Financial Advisors and Senior Manager and Practice Leader at Deloitte & Touche, managing the investment consulting services practice in California and providing investment advisory/wealth management services to affluent clients. Before joining Deloitte & Touche, Keley spent three years at Progress Investment Management, where she was Director of Manager Development, researching and recommending women- and minority-owned and emerging money managers and hedge funds to institutional clients. While at Progressive Asset Management (not related to Progress Investment Management), Keley developed investment strategies and recommended money managers to individuals and institutions interested in socially responsible investing. Keley began her career with Kidder Peabody in New York and London on the Fixed Income Sales and Trading desk, working with central banks globally.

BSBA—University of Nebraska at Omaha

MBA—Harvard Graduate School of Business

Series 65 securities license

Jeff S. Petersen, President of Operations

Jeff comes to Willow Grove Advisors from Alfred Petersen Construction and Alfred Petersen Homes, Inc., where he spent 18 years as Chief Operating Officer and Secretary/Treasurer responsible for all internal systems, operations, accounting, and internal auditing. Jeff has been active in futures and options trading since leaving Chicago, where he was an independent futures and options trader. Prior to moving to Chicago, Jeff worked as an auditor for various hotels in Lincoln, Nebraska.

BSBA—University of Nebraska at Lincoln

Series 65 securities license



WILLOW GROVE ADVISORS

Form ADV Part 2B March 29, 2019

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This brochure supplement provides information about Keley Petersen, Jeff Petersen and Japke Welschen that supplements the Willow Grove Advisors, LLC brochure. You should have received a copy of that brochure. If you did not receive Willow Grove Advisor's brochure or if you have any questions about the contents of this supplement, please contact us at (510) 705-1693 or email Keley@WillowGroveAdvisors.com.

Additional information about Advisory Affiliates of Willow Grove Advisors, LLC (CRD# 151993) is available on the SEC's website at <http://www.adviserinfo.sec.gov/>

Item 2: Educational Background and Business Experience

Keley R. Petersen, President

Born 1960, CRD# 1738238

Educational Background

- BSBA—University of Nebraska at Omaha (1983)
- MBA—Harvard Graduate School of Business (1987)
- Series 65 securities license

Business Experience

- Willow Grove Advisors, 2009 – present, President
- Contango Capital Advisors, Ultra High Net Worth Client Group, 2005-2008 – Wealth Manager
- Twenty-nine years' experience in various senior financial advisory and wealth management positions

Jeff S. Petersen, President of Operations

Born 1963, CRD# 5569357

Educational Background

- BSBA—University of Nebraska at Lincoln (1989)
- Series 65 securities license

Business Experience

- Willow Grove Advisors, 2009 – present, President of Operations
- Alfred Petersen Homes Inc., 2004 – 2010, Secretary/Treasurer

Japke J.A. Welschen, Wealth Advisor

Born 1980, CRD# 6867854

Educational Background

- BA—BLCU University, Beijing, China (2012)
- MA Finance, Golden Gate University, San Francisco (2017)
- Series 65 securities license

Business Experience

- Willow Grove Advisors, 2017– present, Wealth Advisor
- Welsch-Investments International, 2014-2015, Managing Director
- The Asian Banker Beijing China, 2012-2015, Manager of Business Development North Asia

Item 3: Disciplinary Information

Willow Grove Advisors, LLC and its supervised persons, have no previous or pending disciplinary actions taken against it. Please visit <http://www.adviserinfo.sec.gov/> at any time to view Willow Grove Advisors registration information and any applicable disciplinary action.

Item 4: Other Business Activities

Willow Grove Advisors, LLC's supervised persons have no other business activities.

Item 5: Additional Compensation

Willow Grove Advisors, LLC's supervised persons receive no additional compensation from clients.

Item 6: Supervision

Willow Grove Advisors, LLC has two principal officers, Keley Petersen and Jeff Petersen. Keley Petersen serves as the chief compliance officer for Willow Grove Advisors, (510) 705-1693, and is the primary determinant of investment account allocations on behalf of clients, as well as, client account reviews, and overall supervision of Willow Grove Advisors, its supervised persons and employees.