

FORM ADV**Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

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Name of Investment Adviser:

Bleeck Financial Management, Inc.

Address: (Number and Street)

(City)

(State)

(Zip Code)

Area Code: Telephone Number:

533 Airport Blvd., Suite 400**Burlingame****CA****94010****(650) 685-2425**

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.**

FORM ADV**Part II - Page 2**

Applicant:

Bleeck Financial Management, Inc.

SEC File Number:

801-

Date:

05/23/07**1. A. Advisory Services and Fees.** (check the applicable boxes)For each type of service provided, state the approximate % of total advisory billings from that service.
(See instruction below.)**Applicant:**

- | | | | |
|-------------------------------------|-----|---|------------------|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services | <u>100%</u> |
| <input type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | <u> % </u> |
| <input type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above | <u> % </u> |
| <input type="checkbox"/> | (4) | Issues periodicals about securities by subscription | <u> % </u> |
| <input type="checkbox"/> | (5) | Issues special reports about securities not included in any service described above | <u> % </u> |
| <input type="checkbox"/> | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities | <u> % </u> |
| <input checked="" type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities | <u>0%</u> |
| <input type="checkbox"/> | (8) | Provides a timing service | <u> % </u> |
| <input type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above | <u> % </u> |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term?Yes ☒ No ☐**C.** Applicant offers investment advisory services for: (check all that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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Applicant:

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Date:

07/09/04**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | I. Options contracts on: |
| <input checked="" type="checkbox"/> (3) foreign issues | <input type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | J. Futures contracts on: |
| <input checked="" type="checkbox"/> C. Corporate debt securities | <input type="checkbox"/> (1) tangibles |
| (other than commercial paper) | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> D. Commercial paper | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> (1) real estate |
| <input checked="" type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (2) oil and gas interests |
| | <input type="checkbox"/> (3) other (explain on Schedule F) |
| G. Investment company securities: | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input type="checkbox"/> (1) variable life insurance | |
| <input type="checkbox"/> (2) variable annuities | |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Charting | (4) <input checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options, uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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Applicant:

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801-

Date:

07/09/04**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?

Yes No
☒ ☐

(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- | | |
|-----------------|--|
| • name | • formal education after high school |
| • year of birth | • business background for the preceding five years |

7. Other Business Activities. (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.....

Yes No
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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Applicant:

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9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☒ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Review of accounts is done monthly, quarterly, semi-annually or annually, depending on the size and complexity of the account. Market conditions could trigger more frequent reviews. The work is done by adviser's personnel who are authorized to act in the capacity of investment advisers utilizing a computer to update account values and print financial reports in the form of income statements and balance sheets. Particular attention is paid to a client's investment positions and the tax consequences of those positions. The review will cover as much area as the adviser feels indicated under the circumstances, but should normally include the following items: tax and estate planning, insurance, investments, pensions and profit-sharing, possibly real estate, etc.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Adviser utilizes a computer program to download information from institutional programs and to generate monthly, quarterly and other reports for investment advisory clients. The work is done by the advisory persons mentioned above utilizing a computer to update account values and print the various reports. Adviser furnishes clients printouts of their quarterly positions and annual year-end statements. Clients also receive monthly, quarterly and yearly reports on their accounts with their custodial broker-dealer from that broker-dealer.

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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Applicant:

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07/09/04**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold?

Yes No

☒ ☐

(2) amount of the securities to be bought or sold ?

Yes No

☒ ☐

(3) broker or dealer to be used ?

Yes No

☐ ☒

(4) commission rates paid?

Yes No

☐ ☒

B. Does applicant or a related person suggest brokers to clients?

Yes No

☒ ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients?

Yes No

☐ ☒

B. directly or indirectly compensates any person for client referrals?

Yes No

☐ ☒

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?

Yes No

☐ ☒**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:

Bleeck Financial Management, Inc.

SEC File Number:

801-

Date:

02/13/09

Item of Form (identify)	Answer
General:	<p>Each investment advisory client will be given a copy of Part II of Form ADV, including Schedule F, or a brochure containing similar information.</p> <p>Clients are under no obligation to act on adviser's recommendations. Furthermore, if clients elect to act on any of adviser's recommendations, they are under no obligation to effect any transactions through adviser, through any particular broker-dealer or through any associated person.</p> <p>Under no circumstances will adviser take custody of funds, securities or any other assets of its clients.</p> <p>Adviser does have a written contract for use with investment advisory clients. Adviser's only investment advisory services will be limited to those services described in its application. Fees will not be charged six months or more in advance. All fees are negotiable.</p> <p>Either party may terminate a contract by thirty (30) days' written notice to the other delivered either personally or by mail. Client may cancel at any time, but will be charged for the time already expended and for out-of-pocket expenses. Upon termination, adviser will summarize all work done, and client shall have access to work done up to that point.</p>
1.A.(1)	For certain clients adviser may furnish investment supervisory services in the following manner (subject to client's prior acceptance): Adviser will monitor client's situation periodically throughout the year and call client as necessary. Adviser will also review account quarterly and annually to go into client's situation in greater depth. Adviser will take a limited power of attorney from certain advisory clients to effect transactions. Clients will be billed for this type of service monthly after the work has been performed. Compensation for this service is 1% of the assets under management, prorated monthly and billed monthly in arrears.
1.A.(7)	Advice on non securities matters is given only as a part of the investment supervisory services shown in 1.A.(1), above.
1.A.(1) 1.A.(7)	Adviser will use other professionals as necessary in working for client, with the client's prior approval.
5.	A four-year college degree or equivalent will be required for associated persons with the adviser who will give investment advice.
6.	<p>Education and Business Background:</p> <p>Robert M. Bleeck, born 1946.</p> <p>Education: University of California at Los Angeles, 1 year; Cal State Northridge, 3 years, graduated 1971 with a BS in Business.</p> <p>Business Background: Owner and President, Robert M. Bleeck CPA, Inc., 1982 to the present (name changed to Bleeck Financial Management, Inc., 2002).</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:

Bleeck Financial Management, Inc.

SEC File Number:

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Date:

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Item of Form (identify)	Answer
7.A.	Adviser is a Certified Public Accountant. Adviser is a financial planner. Approximately 80% of adviser's time is spent on investment advisory activities and approximately 20% is spent on the CPA business.
9.D. 9.E.	Adviser may recommend the purchase or sale of securities in which it or persons affiliated with adviser may have a position. Adviser or persons affiliated with adviser may also purchase or sell securities that have been recommended to clients. Any situations that may reasonably be expected to be conflicts of interest will be fully disclosed to clients.
Code of Ethics	<p>Adviser has a Code of Ethics that requires all of its personnel to conduct business with the highest level of ethical standards, keeping in mind at all time the Advisor's fiduciary duties to its clients. This means Advisor has a duty to exercise its authority and responsibility for the benefit of its clients, to place the interests of its clients first. Adviser will not disclose any nonpublic personal information about a Client to any nonaffiliated third party unless the Client expressly gives permission to the Advisor to do so.</p> <p>Adviser and its personnel will not attempt to defraud, make any untrue statement of a material fact, omit to state a material fact necessary in order to make a statement true, engage in any fraudulent or deceitful act, practice or course of business or engage in any manipulative practices. Adviser will disclose potential and actual conflicts of interest to its clients.</p> <p>Adviser shall only recommend those investments that it has a reasonable basis for believing are suitable for a client, based upon the client's particular situation and circumstances.</p> <p>Adviser's Chief Compliance Officer will be responsible for supervising the activities of all its personnel by establishing procedures to prevent and detect violations of the law, analyzing its operations and controls to ensure compliance with securities laws, ensuring that all advisory personnel fully understand the Advisor's policies and procedures, establishing policies and procedures governing personal security transactions, and establishing an annual review system to assure that the Advisor's policies and procedures are effective and are being followed.</p> <p>Adviser will provide a copy of its Code of Ethics to any client or prospective client upon request.</p>
12.A.(1) 12.A.(2)	Adviser will obtain from certain clients limited powers of attorney to effect certain types of trades, subject to limitations specified by the clients. For such trades adviser will direct the execution of the trades unless the limited power of attorney expressly designates some other arrangement.
12.B.	Adviser suggests brokers for the service described on a previous page under 1.A.(1) based upon the size of commissions when compared to other brokers, and adviser's opinion of the relative quality of service, types of reports and other materials furnished to clients and adviser by the brokers and the stability afforded by the recommended broker's financial condition and general reputation in the investment community.

Complete amended pages in full, circle amended items and file with execution page (page 1).