

Atwater Malick, LLC

Firm Brochure

This brochure provides information about the qualifications and business practices of Atwater Malick, LLC. If you have any questions about the contents of this brochure, please contact us at (717) 439-9410 or by email at: info@atwatermalick.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Atwater Malick, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Atwater Malick, LLC's CRD number is: 147972

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Atwater Malick, LLC's on January 25, 2016 are described below. This list summarizes changes to policies, practices or conflicts of interests only.

- Atwater Malick, LLC has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.
- Atwater Malick, LLC has requires an account minimum of \$500,000.
- Item 11 D. has been updated to reflect that block trades to buy or sell common stocks in both client accounts and accounts for AM representatives.

Item 3: Table of Contents

Table of Contents

Item 2: Material Changes.....	i
Item 3: Table of Contents.....	ii
Item 4: Advisory Business.....	1
A. Description of the Advisory Firm.....	1
B. Types of Advisory Services.....	1
Investment Supervisory Services	1
Financial Planning.....	1
Services Limited to Specific Types of Investments	1
C. Client Tailored Services and Client Imposed Restrictions	2
D. Wrap Fee Programs.....	2
E. Amounts Under Management.....	2
Item 5: Fees and Compensation.....	3
A. Fee Schedule.....	3
Investment Supervisory Services Fees.....	3
Financial Planning Fees	3
Fixed Fees	3
Hourly Fees	4
B. Payment of Fees.....	4
Payment of Investment Supervisory Fees	4
Payment of Financial Planning Fees	4
C. Clients Are Responsible For Third Party Fees	4
D. Prepayment of Fees	4
E. Outside Compensation For the Sale of Securities to Clients.....	4
Item 6: Performance-Based Fees and Side-By-Side Management	5
Item 7: Types of Clients	5
Minimum Account Size.....	5
Item 8: Methods of Analysis, Investment Strategies and Risk of Investment Loss	5
A. Methods of Analysis and Investment Strategies.....	5
Charting analysis.....	5
Fundamental analysis	5
Technical analysis.....	5
Cyclical analysis	5
B. Material Risks Involved	6
C. Risks of Specific Securities Utilized	6

Item 9: Disciplinary Information	6
Item 10: Other Financial Industry Activities and Affiliations.....	6
A. Registration as a Broker/Dealer or Broker/Dealer Representative	6
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor	7
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....	7
D. Selection of Other Advisors or Managers and How This Advisor is Compensated for Those Selections.....	7
Item 11: Code of Ethics, Participation in Transactions, Personal Trading.....	7
A. Code of Ethics.....	7
B. Recommendations Involving Material Financial Interests	7
C. Investing Personal Money in the Same Securities as Clients.....	7
D. Trading Securities At/ Around the Same Time as Clients' Securities	8
Item 12: Brokerage Practices.....	8
A. Factors Used to Select Custodians and/or Broker/Dealers	8
1. Research and Other Soft-Dollar Benefits	9
2. Brokerage for Client Referrals	9
3. Clients Directing Which Broker/Dealer/Custodian to Use	9
B. Aggregating (Block) Trading for Multiple Client Accounts	9
Item 13: Reviews of Accounts	9
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....	9
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	10
C. Content and Frequency of Regular Reports Provided to Clients.....	10
Item 14: Client Referrals and Other Compensation	10
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)	10
B. Compensation to Non-Advisory Personnel for Client Referrals.....	10
Item 15: Custody.....	10
Item 16: Investment Discretion	10
Item 17: Voting Client Securities (Proxy Voting).....	11
Item 18: Financial Information.....	11
A. Balance Sheet	11
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients	11
C. Bankruptcy Petitions in Previous Ten Years	11

Item 4: Advisory Business

A. Description of the Advisory Firm

This firm has been in business since September 19, 2008, and the principal owners are Matthew Charles Malick and Benjamin Howe Atwater.

B. Types of Advisory Services

Atwater Malick, LLC (hereinafter "AM") offers the following services to advisory clients:

Investment Supervisory Services

AM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. AM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

AM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. AM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Financial Planning

Financial planning and consulting services may include, but are not limited to, life insurance, tax concerns, retirement planning (including retirement plan analysis), investment planning, college planning, and debt/credit planning. This service will be based on fixed fees or hourly fees and the final fee structure will be documented in a Financial Planning or Consulting Agreement. However, this service may also be offered free of charge for clients with managed investment accounts.

Services Limited to Specific Types of Investments

AM does not limit its investment advice and/or money management to specific types of investments or securities. AM may use a variety of securities to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

AM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client's Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client-specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent AM from properly servicing the client account, or if the restrictions would require AM to deviate from its standard suite of services, AM reserves the right to end the relationship.

D. Wrap Fee Programs

AM does not participate in any wrap fee programs.

E. Amounts Under Management

AM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 99,815,756.00	\$ 4,607,785.00	April 2015

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee
\$1 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.75%
Above \$3,000,000	0.50%

These fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with five days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract.

Advisory fees are withdrawn directly from the client's accounts with client written authorization.

Because client fees will be withdrawn directly from client accounts, this advisor must: (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian; (B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account; (C) Send the client a written invoice itemizing the fee, including any formulae used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Financial Planning Fees

Fixed Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$1,500 and \$10,000. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

Hourly Fees

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is \$150. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears. Advisory fees are also invoiced and billed directly to the client quarterly in arrears. Clients may select the method in which they are billed.

Payment of Financial Planning Fees

Fixed Financial Planning fees are paid via check. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund policy is necessary.

Hourly Financial Planning fees are paid via check. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund policy is necessary.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, transaction fees etc.). Those fees are separate and distinct from the fees and expenses charged by AM. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

AM collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither AM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

AM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

AM generally provides investment advice to the following Types of Clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Trusts, Estates, or Charitable Organizations
- ❖ Corporations or Business Entities

Minimum Account Size

There is an account minimum, \$500,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

A. Methods of Analysis and Investment Strategies

AM's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

Charting analysis involves the use of patterns in performance charts. AM uses this charting technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

AM uses Long Term, Short Term, Trading, Short Sales, Margin Transactions, Options Writing including covered options, uncovered options, or spreading strategies and does not feel that there are any material risks with any of these methods.

AM utilizes investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

AM invests their clients' accounts primarily in individual equities, individual fixed income instruments and cash equivalents. It is vital to note that equities are inherently risky. Often analysts and other experts cannot anticipate equity losses. Although AM's preference is for "high-quality" fixed income, fixed income also encompasses various risks, including credit and interest rate risk. Cash equivalents, e.g. money market funds, historically display very low risk, but no government guarantee exists for money market funds.

AM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither AM nor its representatives registered as a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither AM nor its representatives registered as a FCM, CPO, or CTA.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither AM nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisors or Managers and How This Advisor is Compensated for Those Selections

AM does not utilize nor select other advisors or third party managers. All assets are managed by AM management.

Item 11: Code of Ethics, Participation in Transactions, Personal Trading

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Clients may request a copy of our Code of Ethics from management.

B. Recommendations Involving Material Financial Interests

AM does not recommend that clients buy or sell any security in which a related person to AM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of AM may buy or sell securities for themselves that they also recommend to clients. AM will always document any transactions that could be construed as conflicts of interest.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of AM may buy or sell securities for themselves at or around the same time as clients. AM will not trade non-mutual fund or non-ETF securities 5 days prior to or 5 days after trading the same security for clients, with the following exempted transactions.

Exempted Transactions:

- Purchases or sales affected in any account over which the access person has no direct or indirect influence or control.
- Purchases which are part of an automatic investment plan, including dividend reinvestment plans.
- Purchases effected upon the exercise of rights issued by an issuer pro rata to all holders of a class of its securities, to the extent such rights were acquired from such issuer, and sales of rights so acquired.
- Acquisition of securities through stock dividends, dividend reinvestments, stock splits, reverse stock splits, mergers, consolidations, spin-offs, and other similar corporate reorganizations or distributions generally applicable to all holders of the same class of securities.
- Purchases or sales of common stocks that are traded on major exchanges with an average daily volume of at least 100,000 shares and carry a market capitalization of at least \$1 billion.
- Open-end investment company shares other than shares of investment companies advised by the firm or its affiliates or sub-advised by the firm.
- Certain closed-end index funds.
- Unit investment trusts.
- Exchange traded funds that are based on a broad-based securities index.
- Futures and options on currencies or on a broad-based securities index.
- Block trades to buy or sell common stocks in both client accounts and accounts for AM representatives

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian, Fidelity Brokerage Services LLC, was chosen based on their relatively low transaction fees and access to a wide variety of investment vehicles. AM will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

1. Research and Other Soft-Dollar Benefits

There is no minimum client number or dollar number that AM must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for AM to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. The first consideration when recommending broker/dealers to clients is best execution.

2. Brokerage for Client Referrals

AM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

AM allows clients to direct brokerage. AM may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage AM may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

AM maintains the ability to block trade purchases across accounts to facilitate trades executed across many client accounts. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients are at a disadvantage due to the best execution practices of our custodian.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

The securities in every client's account will be under continuous review. Client accounts will typically be reviewed quarterly. Accounts will be reviewed by Managing Members; Matthew Charles Malick and/ or Benjamin Howe Atwater. The chief advisors are instructed to review client's accounts with regards to their investment policies and risk tolerance levels. All accounts at AM are assigned to these reviewers.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive a written report, upon request, detailing the client's account holdings and performance, which may come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

AM does not receive any economic benefit directly or indirectly from any third party for advice rendered to AM clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

AM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

AM does not take custody of client accounts at any time. Custody of clients' accounts is held primarily at the custodian. Clients will receive account statements from the custodian and should carefully review those statements.

Item 16: Investment Discretion

For those client accounts where AM provides ongoing money management or investment advice with ongoing supervision, AM maintains limited power of authority over client accounts with respect to securities to be bought and sold and amount of securities to be bought and sold. All buying and selling of securities is explained to clients in detail before an advisory relationship has commenced.

Item 17: Voting Client Securities (Proxy Voting)

AM will not ask for, nor accept voting authority for client securities. Clients may choose to receive proxies directly from the issuer of the security or the custodian. Clients may choose to direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

AM does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither AM nor do its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Neither AM nor have its management been the subject of a bankruptcy petition in the last ten years.