

**Form ADV**  
**Uniform Application for Investment Adviser Registration**  
**Part 2- Page 1**

**Bryn Mawr Financial**

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(616) 719-1246

**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 government authority.**

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Bryn Mawr Financial, LLC is a buy-side asset manager, we advise clients to invest in investment-grade fixed-income space as well as the listed equities space. We recommend a buy-and-hold strategy; we purchase bonds for yield enhancement and duration and equities for growth potential. The average weighted maturity in our client's bond portfolio is five years. We look to purchase across key sectors (financials, pharmaceuticals, energy, utilities, sovereigns, industrials, consumer cyclicals, etc.) on our clients behalf. We purchase across the yield curve from 2-years to 30-years for bonds. We look to purchase new issue in USD, EUR, and GBP. We utilize credit analysts who help us determine what bonds we should be purchasing and we use equity analysts to help us determine what stocks we should be purchasing. We don't trade with leverage unless we believe it's warranted.

1. Advisory Services and Fees:

Bryn Mawr Financial, LLC (BMF) provides investment supervisory services to one hundred percent of our clients. We are not involved in financial planning, charging a fee for investment advice, producing special reports, charts or graphs, or provide a timing service. Our fees are charged as a percentage of assets under management or on a fixed fee schedule. Clients can choose between two fee schedules:

**Schedule a)**

Flat Rate Fee of \$10,000 paid monthly in arrears. This fee schedule provides the client a limited amount of services, these being limited to recommendations of securities to be purchased and fulfilling the purchase. Tracking the portfolio performance, and maintaining recommended levels will not be performed.

**Schedule b)**

A percentage of assets under management based on the fair market value of the client's portfolio marked on the last business day of each month. Fees are payable thirty (30) days following the mark. This is a full service fee schedule, performance will be tracked, portfolio will be maintained and purchases will be fulfilled at client's request. Percentages are calculated on the following schedule:

Level 1: 2.5% of assets below \$10 million

Level 2: 2% of assets \$10 million- \$25 million

Level 3: 1.5% of assets \$25 million- \$50 million

Level 4: 1% of assets greater than \$50 million

Under some circumstances the firm's fees are negotiable and may be lower than the listed rate schedule. Accordingly, rates may vary based on a variety of factors. For example, in determining fees, rates, and minimums, the firm may aggregate related accounts and, for billing purposes, treat them like one account. Clientele of the Firm, in addition to other required documents, sign a management agreement which contains the fee schedule. In the case of a brokerage account, fees will be billed to, and paid directly by the client. We will send our monthly fee invoice to the custodian and to each client. The client fee invoice will state the applicable annualized rate(s), the value(s) of the Account upon which each fee is calculated, the manner in which the fee is calculated, and the amount of the fee. A client may object to the deduction of fees from the

account by notifying us at the address or telephone number shown on each billing invoice or by notifying the custodian. Clients may terminate this authorization at any time by giving us ten days written notice. Authorized person(s) of the company may terminate this authorization at any time by giving us 30 days written notice. Upon termination, the company is responsible for any additional fees, including but not limited to, any ongoing third party administrative fees. It is also the company's fiduciary responsible to locate another firm to make investment decisions on the participants' behalf.

We may from time to time unilaterally amend our fees and billing arrangements. Any change will only become effective after 30 days' prior written notice. Our fees are based on the financial performance or capital gains or losses experienced by the Account. A client may terminate our Investment Management Agreement for any reason at any time and, within the first five business days after signing the contract, without any cost or penalty. Thereafter, the contract may be terminated either by a client or the Firm at any time by giving ten days' written notice. Upon termination, fees will be prorated for the number of days that services were rendered based on the Account's valuation as of the termination date so long as the written notification was received within the specified times frames of the account being closed and/or transferred.

2. Types of Clients:

BMF's clients are exclusively corporations or large single family offices.

3. Types of Investments:

BMF invests for or recommends to our clients equity securities including, exchange listed, over the counter and foreign issued securities; warrants; corporate debt; commercial paper; CD's; municipal securities; investment company securities including variable life insurance, variable annuities, mutual fund shares; United States and foreign government securities; option contracts on equities.

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

BMF analyzes securities using charting, fundamental and technical methods. We use financial newspapers and magazines, research provided from outside vendors, corporate rating services, annual reports and prospectuses and company press releases as sources of information to help make our recommendations. Our strategies include long term, short term and trading purchases.

5. Education & Business Standards

Bryn Mawr Financial, LLC normally requires that an associate of the firm have passed the Series 65 or 66 examinations administered by the Financial Industry Regulatory Authority, Inc. (the "FINRA"). Exceptions may be made based on substantial prior experience in the securities or insurance industries or attaining professional designations which require similar education and

competency testing, such as a certified public accountant, chartered financial analyst, or certified financial planner.

**Brent Richardson- President**

Born in 1969 in Lansing, Michigan; he attended Northwood University graduating in 1995. In 2002 he started Bryn Mawr Financial, LLC an investment firm. In the years to follow he also worked at Northwestern Mutual Financial Network, Drummond Financial and Flagstar Bank as a financial advisor. His continuing position at Bryn Mawr Financial, LLC as President, he is responsible for the day to day decisions and lead of the trading group.

**Kevan Richardson- Vice President Operations**

Born in 1971 in Lansing, Michigan; he attended Olivet College graduating in 1997. In 2002 he started Bryn Mawr Financial, LLC an investment firm. In the years to follow he also worked at Northwestern Mutual Financial Network, Drummond Financial and Hans Financial as a financial advisor. His continuing position at Bryn Mawr Financial, LLC as Vice President Operations, he is responsible for the daily operations, trade confirmations and execution, and record management.

**Marc Richardson- Chief Compliance Officer**

Born in 1974 in Lansing, Michigan; he attended Alma College graduating in 1996. In 2002 he started Bryn Mawr Financial, LLC an investment firm. In the years to follow he also worked at USA Wealth Management as Vice President in charge of the RIA and portfolios, at Sureprep as Vice President in charge of sales, Gabridge & Co. as business development manager. His continuing position at Bryn Mawr Financial, LLC as Vice President Finance and Chief Compliance Officer, he is responsible for company accounting and cash management as well as oversight of all company investment activity.

**6. Other Business Activities**

BMF is actively engaged working with several clients as a back office agent. We help our clients with their clearing and settlement needs through our clearing relationship. Our client pays us on a per trade basis as well as a flat fee arrangement. Our supervisory clients do have the option for us to perform this service as well. Our back office personnel do not have any investment supervisory contact with any of our clients.

**7. Other Financial Industry Activities or Affiliations**

BMF does not have any other activities or affiliations in the financial industry. We are not a general partner in any partnership in which any client would be solicited to invest.

**8. Participation or Interest in Client Transaction**

BMF does not have any financial interest in any client transactions.

9. Conditions for Managing Accounts

The firm requires a minimum account size of \$5,000,000 (Five Million Dollars) for portfolio asset management and supervision. Exceptions may be made, solely at the firm's discretion, based on such factors as prior or anticipated investment activity. We may aggregate related accounts in the same household in determining whether the account minimum has been met and in calculating the rate applicable to our fees. Minimums may be negotiated.

10. Review of Accounts

Representatives of Bryn Mawr Financial, LLC evaluate which portfolios are best suited to a client's stated goals and determined risk tolerances. Any change in a client's financial situation, goals or risk tolerance may also affect the current strategy guiding a client's portfolio and other investments. Clients are hereby urged to notify their adviser representative of any such change at their earliest convenience. The number of accounts handled by the firm's representatives varies because each representative is generally responsible for servicing those clients with whom he or she has personally developed a client relationship.

In addition to the monthly or quarterly statements that clients will receive from the custodian of their accounts showing account activity and holdings, Bryn Mawr Financial, LLC will provide monthly statements showing the month end balance and the invoice fee. Those clients whose investments include mutual funds will receive customary reports from the mutual fund companies holding those investments.

11. Investment or Brokerage Discretion

BMF does not have the authority to determine, without specific client consent, which securities to be bought or sold, amount of securities to trade, broker or dealer to use nor commission to be paid. We do maintain a relationship with a clearing firm and do recommend this firm to our clients. Our clients enjoy the same benefits from this relationship as if they were at any other broker or dealer. We do use the research provided from this firm with all our clients.

12. Additional Compensations

BMF does not receive any additional compensation from any non-client for the advice we give to clients. We do not compensate anyone for client referrals.

13. Balance Sheet

BMF is not required to provide its balance sheet as we do not custody our client's funds or require prepayment of \$500 per client.

14. Investment Risks and Rewards.

All investments bear different types and degrees of risk. While our investment strategies are designed to provide appropriate investment diversification, some investments have significantly

greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Our investment strategies seek to balance risks and rewards to achieve investment objectives. Clients need to ask questions about investment risks they do not understand. We would be pleased to discuss them.

We strive to render our best judgment on behalf of our clients. Still, we cannot assure clients that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment adviser but is not a reliable predictor of future performance. We continuously strive to provide outstanding long-term investment performance, but many economic and market variables beyond our control can affect the performance of an investment portfolio.

15. Proxy Voting.

Unless otherwise mutually agreed in writing, we will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in clients' accounts. Proxy solicitation materials will be forwarded to clients for response and voting.

16. Code of Ethics

The Firm adopted a Code of Ethics as of August 1, 2009. The Code of Ethics sets forth the standards of business conduct that the Firm expects all officers, directors, employees, and advisory representatives to follow. The Code also describes certain reporting requirements with which particular individuals associated with or employed by the Firm must comply. The Firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

17. Privacy Policy

Bryn Mawr Financial, LLC is committed to safeguarding the confidential information of our clients; mutual trust is essential to the advisor-client relationship. Personal privacy is of the utmost importance to our clients. This is our policy describing how we treat your personal information. We welcome any comments or concerns you may have about your personal privacy.

18. Information We Collect From You

We collect nonpublic personal information from you, our client, to assist us in giving you appropriate investment advice and in managing your investments. The categories of nonpublic information that we collect from each client depend upon the scope of the client engagement. We collect nonpublic personal information about you from the following sources:

\* Information we receive from you on applications or other forms, such as your name, address, social security number, telephone number, assets, income, taxes, medical and health

information to the extent that it is needed for the financial planning process, and insurance beneficiaries.

\* Information about your transactions with us, our affiliates, custodians, or others, such as your account balance, investment cost, investment distributions, investment gain or loss, payment history, parties to transactions, account usage, and insurance policy coverage and premiums.

\* "Nonpublic personal information" is nonpublic information about you that we obtain in connection with providing a financial product or service to you for personal, family, or household purposes. It does not include information available from government records, widely distributed media, or government mandated disclosures.

19. Third Parties with Whom We May Share Information

We do not disclose nonpublic personal information about our clients or former clients to anyone except as otherwise permitted by law. For example, we are permitted by law to share information about you with:

Our Investment Advisory Representatives, employees, and other representatives who may have referred you to our firm.

Companies that assist us in processing your transactions and servicing your account, such as introducing and clearing brokerage firms, mutual fund companies, and insurance companies. An accountant, tax preparer, or lawyer who is representing you. Federal and state regulators who regulate our firm. We do not provide your personally identifiable information to direct marketers or independent solicitors (for other companies) for any purpose.

20. Disclosure of Information about Former Customers

If you decide to close your account(s), we will continue to adhere to the privacy practices described in this notice when you become a former client. You become a former client when your Investment Management Agreement with us is terminated. We will maintain personally identifiable information about you during the time you are a client, and for any time thereafter that we are required to maintain the records by federal and state securities laws. After this required period of record retention, all of your information will be destroyed.

21. Our Security Policies & Practices

We take all reasonable steps to assure the privacy of client information. We restrict access to nonpublic personal information about you to those employees who have a business or professional reason for knowing, as permitted by law. We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.



Disclosure Brochure (Part 2 of this form ADV)

By signing below, the client(s) do certify that s/he (they) has (have) received and read carefully this disclosure brochure and had the opportunity to ask such questions as may have occurred in reading and/or discussing the services provided and the costs of those services.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_