

Bradford Financial Services, Inc.

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September 24, 2020

This Brochure provides information about the qualifications and business practices of Bradford Financial Services, Inc. If you have any questions about the contents of this Brochure, please contact us at (978) 685-8529 or bob.kitsos@securitiesamerica.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.

Bradford Financial Services, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Bradford Financial Services, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated September 24, 2020 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, 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 business’ fiscal year. We may further 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.

Currently, our Brochure may be requested by contacting Haralambos Kitsos, CFP at (978) 685-8529 or bob.kitsos@securitiesamerica.com and it is available free of charge.

Additional information about Bradford Financial Services, Inc. is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Bradford Financial Services, Inc. who are registered, or are required to be registered, as investment adviser representatives of Bradford Financial Services, Inc..

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Item 4 – Advisory Business

- A. Bradford Financial Services, Inc. has been providing advisory services since March 3, 1997. The sole principal owner is Haralambos Ignatios Kitsos.
- B. Bradford Financial Services, Inc. furnishes investment advice through consultations.
- C. The types of advisory services offered by Bradford Financial Services, Inc. are the following:

A variety of individualized investment advisory services are available through BRADFORD FINANCIAL SERVICES, INC. Through meetings and discussions, you will provide detailed financial and other pertinent data to your Investment Advisor Representative (hereinafter referred to as “IAR”). Your IAR will help you determine your risk tolerance, investment goals, and other relevant investment guidelines. This information will be used to help you choose the appropriate investment advisory services from among three general categories. You may impose restrictions on investing in certain securities or types of securities. Specific services, related fee arrangements, and all terms and conditions of our client agreement are contained in the BRADFORD FINANCIAL SERVICES, INC. Investment Advisory Agreement (“Agreement”) that is provided for your signature.

The three general categories are:

Service 1: Financial Planning and Consulting Services: Your IAR may provide financial planning services consistent with your investment objectives, financial and tax status, risk tolerance and time horizon. Your IAR may, on occasion, provide general non-securities advice on topics that may include budgeting and cash flow analysis, income tax planning, education planning, retirement planning, estate planning, and fringe benefit analysis.

When generating a financial plan, your IAR may:

- a. Consult with you and analyze your financial needs and objectives based upon the information provided by you; or,
- b. Prepare a written financial plan based on your identified financial needs and objectives; or,
- c. Recommend, as part of your financial plan, investment strategies he or she believes are suited for your identified financial needs and objectives; or,
- d. Review the performance of your investment accounts (whether purchased through BRADFORD FINANCIAL SERVICES, INC. or identified to BRADFORD FINANCIAL SERVICES, INC. by you for review) in light of your identified needs, objectives, and financial plan on a periodic basis, as specific in the Agreement; or,

- e. Discuss the review with you annually or more frequently as is dictated by the nature of your investment or your request; or,
- f. Recommend either verbally or in writing, generic changes in your investments, strategy, or financial plan in connection with the review of your investments or the identification of new financial needs or objectives by you.
- g. When called for, your IAR may conduct a single-needs analysis to provide research, plan designs, or specific investment advice for you if you do not need or desire the more traditional financial planning process described in parts (a) through (f).

All investment analyses and recommendations will be based upon information provided to your IAR by you. There will be no independent investigation of your background information, nor update of such information, without your express written consent. It remains your responsibility to advise your IAR of any changes in circumstances, e.g. financial needs, objectives, goals and investments held with other firms or any other changes which would impact your financial condition.

Service 2: Asset Management Services: Your IAR may offer an asset management service to you pursuant to an agreement between you and BRADFORD FINANCIAL SERVICES, INC. Your IAR will develop an asset allocation strategy consistent with your investment objectives, financial and tax status, risk tolerance and time horizon. Each asset allocation strategy consists of an agreed to percentage mix of fixed income and equity investments. The fixed income allocation may include one or more of the following: (a) cash; (b) money market funds; (c) U.S. government securities; (d) foreign government bonds; (e) U.S. corporate debt; (f) foreign corporate debt; (g) municipal securities; (h) fixed income mutual funds; and (i) any other appropriate fixed income investment. The equity portion of the allocation may include one or more of the following: (a) individual stocks which are exchange listed; (b) individual stocks which are traded over the counter; (c) individual stocks issued by foreign corporations; (d) equity mutual funds; (e) variable annuity products; (f) securities options contracts (non-discretionary only and limited to purchases of put options where the account is long the underlying security & writing covered calls); (g) interests in direct participation programs; (I) ETFs and (J) any other appropriate equity investment. Recommended mutual funds may be no-load or load-waived.

Once the basic asset allocation strategy is determined, your existing assets may be liquidated (or transferred into the appropriate account) and invested into the investment vehicles chosen by you and your IAR. Reallocation of assets will trigger taxable events except where Individual Retirement Accounts, 401(k) Accounts, 403(b) Accounts, or other qualified retirement plans or accounts are involved.

Asset management services may be provided on a discretionary or non-discretionary basis at your option. If you choose to provide BRADFORD FINANCIAL SERVICES, INC. with discretion you have empowered your IAR to buy and sell securities without your prior knowledge. All

discretionary accounts must be approved in advance by BRADFORD FINANCIAL SERVICES, INC. Discretionary accounts will only be approved for non-commission generating accounts.

If you receive asset management services, you may contract for quarterly reports that indicate the following information as of the last day of each calendar quarter; (1) all asset class positions; (2) the specific investment vehicles included in each asset class; and (3) the dollar amount invested in each investment vehicle.

Service 3: Third Party Investment Advisory Services: Your IAR may assist you in identifying a third-party registered investment advisor from a list of available advisors who will counsel you with respect to your investment funds. Your IAR will provide you with data concerning the investment advisor's past performance, management style, location, minimum account size, assets under management, fees and other information. If you select this service, your IAR assists you in choosing an appropriate third-party investment advisor, but does not offer advice on behalf of BRADFORD FINANCIAL SERVICES, INC. Your IAR will provide you with both BRADFORD FINANCIAL SERVICES, INC.'s Brochure and the third-party investment advisor's Brochure. Upon selection of a third-party investment advisor, you will sign the applicable advisor's Advisory Contract and deposit funds in an appropriate account. Thereafter, your funds will be invested as recommended by the third-party investment advisor. BRADFORD FINANCIAL SERVICES, INC. and your IARs will not actively participate in the investment selection process.

- D. Financial Planning Services, Portfolio Management for individuals and/or small businesses.
- E. I will charge anywhere from 1% to 2 % yearly on purchases where I am not directly compensated (i.e. no load mutual funds). This percentage may vary. Further clarification is set forth in Item 5 of this brochure.
- F. I may charge on an hourly basis. I will charge a fixed hourly rate of \$250 per hour. The total cost to the client will vary depending on the number of hours required to perform the client approved advisory services.
- G. I prepare financial plans for clients, so I will charge anywhere from \$ 375 to \$1,000 for a financial analysis and plan, depending on the amount of work I need to do and the complexity of the case. Further clarification is set forth in Item 5 of this brochure.
- H. I will receive commissions from the products that I sell through my broker/dealer Securities America, Inc. Further clarification is set forth in Item 5 of this brochure.
- I. I may charge other fees that I deem necessary to compensate me for my time and efforts. If above fees do not apply, I may charge on a per task basis. For example, we may charge specifically for developing an asset allocation model, or retirement analysis, etc. I will charge \$ 250 per hour to perform these tasks.

Item 5 – Fees and Compensation

Bradford Financial Services, Inc. furnishes investment advice through consultations in exchange for the following compensation: A percentage of assets under management, hourly charges, fixed fees , commissions, and other methods described below:

1. I will charge anywhere from 1% to 2 % yearly on purchases where I am not directly compensated (i.e. no load mutual funds). This percentage may vary. The below fee schedule is an example of a fee schedule that applies to Assets Under Management.

Fee Schedule 1

Asset Size	Maximum Annual Fee	Annual Fee
\$ 0 - 250,000	<u>2.00%</u>	1.25 %
\$ 250,000 - 500,000	<u>2.00%</u>	1.125 %
\$ 750,000 - 2,000,000	<u>2.00%</u>	1.05 %
\$ Above 2,000,000	<u>2.00%</u>	1.01 %
<i>* To be Completed Prior to Agreement Execution</i>		

This is a tiered fee schedule. Each level of assets is charged its own corresponding percentage rate. For example, a \$ 500,000 account would be charged 0.20 % on the first \$250,000 and 0.125 % on the next \$250,000 for an effective overall account rate of 0.1625 %.

Furthermore, the fee can be calculated and paid in two ways from which the client selects one. The fee can either be paid and calculated on a monthly or quarterly basis, based on the average daily value of the client's account, computed and payable in advance of the selected billing and payment cycle(monthly or quarterly).

2. I may charge on an hourly basis. I will charge \$250 per hour.
3. I prepare financial plans for clients, so I will charge anywhere from \$375 to \$1,000 for a financial analysis and plan, depending on the amount of work I need to do and the complexity of the case. Fees are estimated by your IAR based upon a preliminary assessment of the complexity of your financial circumstances, the level of skill required to perform the services, and, accordingly, the time likely to be required to perform the services. The fees will be specific in the Agreement. One-half of the estimated fixed fees may be due and payable upon acceptance of the Agreement by your IAR. In such a case, the balance of the fees will be due and payable upon delivery of the plan, recommendations or otherwise at the conclusion of the services. Under no circumstances

will BRADFORD FINANCIAL SERVICES, INC. or your IAR require prepayment of a fee more than six months in advance and in excess of \$500.00.

4. I will receive commissions from the products that I sell through my broker/dealer Securities America, Inc. . This practice may result in the following:
 - a. This practice represents a conflict of interest and gives the IAR or other supervised individuals an incentive to recommend investment products based on the compensation received, rather than on a client's needs. The IAR and supervised individuals at Bradford Financial Services, Inc. will always put the client's need at the forefront of any decision making process regarding their investments. We will describe all investment options to the client and costs associated with those options and help the client make an informed decision that best helps meet their financial goals. Furthermore, we will disclose any conflict of interest verbally to the client by providing them with illustrations of the various costs associated with the different types of purchases they can make.
 - b. Clients have the option to purchase investment products that the IAR recommends through other brokers or agents that are not affiliated with Bradford Financial Services, Inc. or the IAR.
 - c. Bradford Financial Services, Inc. and the IAR does not have more than 50 % of its advisory revenue generated from commissions and other compensation for the sale of investment products of the IAR to clients.
 - d. As a general practice, Bradford Financial Services, Inc. and the IAR do not charge advisory fees in addition to mark-ups. If this were to happen, we would reduce our advisory fees to offset the commissions or markups.
5. I may charge other fees that I deem necessary to compensate me for my time and efforts. If above fees do not apply, I may charge on a per task basis. For example, we may charge specifically for developing an asset allocation model, or retirement analysis, etc. I will charge \$ 250 per hour to perform these tasks. All fees will be disclosed, in advance, in the Client Service Agreement.

All fees are subject to negotiation.

The specific manner in which fees are charged by Bradford Financial Services, Inc. is established in a client's written agreement with Bradford Financial Services, Inc. . Bradford Financial Services, Inc. will generally bill its fees on a quarterly basis. Clients may elect to be billed in advance or arrears each calendar quarter. Clients may also elect to be billed directly for fees or to authorize Bradford Financial Services, Inc. to directly debit fees from client accounts. Management fees shall [or shall not] be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimus contributions and withdrawals). Accounts

initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Bradford Financial Services, Inc.'s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Bradford Financial Services, Inc.' fee, and Bradford Financial Services, Inc. shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Bradford Financial Services, Inc. considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

6. Bradford Financial Services and your IAR may use Third Party Investment Advisory Services. Fees and their method of calculation, for each third-party investment advisor's services are carefully described in their Form ADV Part 2 Brochure. Fees may be negotiable. Third-party investment advisors generally charge fees that on a periodic basis (usually quarterly) are debited from the client accounts on a schedule pre-approved by you. In most cases, the account debiting arrangements are designed to follow the provisions of Rule 206(4)-2 of the Investment Advisers Act of 1940. You should consult the third-party advisor's Form ADV Part 2 Brochure to determine: (a) if compensation is payable before the service is provided; (b) when compensation is payable; (c) how you may get a refund on any pre-paid fees; and (d) how you may terminate an advisory contract before its expiration date. A portion of the fees charged to you by the third-party investment advisor is allocated to BRADFORD FINANCIAL SERVICES, INC. and your IAR for introducing accounts to the advisor. In some cases when a client is introduced by BRADFORD FINANCIAL SERVICES, INC., the third-party investment advisor may choose to implement securities transactions through SECURITIES AMERICA, INC. within its capacity as a broker/dealer, with compensation to SECURITIES AMERICA, INC. in the form of directed commissions. Such arrangements shall be fully disclosed to the client.
7. Your IAR may receive non-cash compensation in the form of due diligence trips or marketing support from product sponsors. Non-cash compensation will not be based on the number or amount of sales, client referrals, or new accounts. This presents a conflict of interest and gives your IAR an incentive to recommend investment products based on the non-cash compensation received, rather than on your needs.
8. Bradford Financial Services, Inc. and the IAR is also a licensed insurance agent. As such, there may be times Insurance and Insurance based investment products are recommended to clients such as annuities, variable life insurance, etc. This practice represents a conflict of interest and gives the IAR or other supervised individuals an incentive to recommend insurance based investment products based on the compensation received, rather than on a client's needs. The IAR and

supervised individuals at Bradford Financial Services, Inc. will always put the client's need at the forefront of any decision making process regarding their investments. We will describe all investment options to the client and costs associated with those options and help the client make an informed decision that best helps meet their financial goals. Furthermore, we will disclose any conflict of interest verbally to the client by providing them with illustrations of the various costs associated with the different types of purchases they can make.

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

Bradford Financial Services, Inc. does not charge any 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

Bradford Financial Services, Inc. provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, endowments, municipalities, trust programs, and banks or thrift institutions.

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

Haralambos I. Kitsos, DBA Bradford Financial Services' security analysis methods include: charting, fundamental, and technical analysis.

The main sources of information that Haralambos I. Kitsos, DBA Bradford Financial Services uses include: Financial newspapers and magazines, Research materials prepared by others, Corporate Rating Services, Timing Services, Annual reports, prospectuses, filings with the Securities and Exchange Commission and Company Press Releases.

The Investment Strategies used to implement any investment advice given to clients include: Long term purchases(securities held at least a year), Short term Purchases(Securities sold within a year), Trading(Securities sold within 30 days), Short Sales, Margin Transactions, and Option Writing, including covered options, uncovered options or spreading strategies.

The types of securities used to implement recommendations are the following:

- A. Equity Securities: 1) Exchange listed securities 2) securities traded over the counter 3) foreign issuers

- B. Warrants
- C. Corporate debt securities(other than commercial paper)
- D. Commercial Paper
- E. Certificates of Deposit
- F. Municipal Securities
- G. Investment Company Securities: 1) variable life Insurance 2) variable annuities 3) mutual fund shares
- H. United States Government Securities
- I. Options contracts on: 1) securities 2) commodities
- J. Futures Contracts on: 1) tangibles 2) intangibles
- K. Interests in partnerships investing in: 1) real estate 2) oil and gas interests

Investing in securities involves risk of loss that clients should be prepared to bear.

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 Bradford Financial Services, Inc. or the integrity of Bradford Financial Services, Inc.'s management. Bradford Financial Services, Inc. has no information applicable to this Item. Pursuant to Section 950 MASS. CODE REGS 12.205(8)(d) clients can obtain the disciplinary history of Haralambos I. Kitsos DBA Bradford Financial Services or any of its representatives(if any) from the Massachusetts Securities Division upon request. They can be reached at: The Commonwealth of Massachusetts, Securities Division, One Ashburton Place, 17 th Floor, Boston MA 02108, (617) 727-3548 or at www.sec.state.ma.us/sct/.

Item 10 – Other Financial Industry Activities and Affiliations

- A. Haralambos I. Kitsos, DBA Bradford Financial Services sells products or services other than investment advice to clients. **Haralambos I. Kitsos, DBA Bradford Financial Services is a registered representative of Securities America, Inc. , 12325 Port Grace Boulevard, La Vista, NE 68128. (865) 777-4677.** Bradford Financial Services, Inc. has arrangements that are material to its advisory business or its clients with a related person who is a : broker/dealer, and several insurance companies or agencies.

- B. Bradford Financial Services, Inc. and the IAR are not registered, nor do they have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- C. I will receive commissions from the products that I sell through my broker/dealer Securities America, Inc. . These products include mutual funds, closed-end investment companies, unit investment trusts, private investment company or “hedge fund,” and offshore funds, insurance company investment products, stocks and bonds. This practice represents a conflict of interest and gives the IAR or other supervised individuals an incentive to recommend investment products based on the compensation received, rather than on a client’s needs. The IAR and supervised individuals at Bradford Financial Services, Inc. will always put the client’s need at the forefront of any decision making process regarding their investments. We will describe all investment options to the client and costs associated with those options and help the client make an informed decision that best helps meet their financial goals. Furthermore, we will disclose any conflict of interest verbally to the client by providing them with illustration of the various costs associated with the different types of purchases they can make.
- D. Third Party Investment Advisory Services: Fees and their method of calculation, for each third-party investment advisor’s services are carefully described in their Form ADV Part 2 Brochure. Fees may be negotiable. Third-party investment advisors generally charge fees that on a periodic basis (usually quarterly) are debited from the client accounts on a schedule pre-approved by you. In most cases, the account debiting arrangements are designed to follow the provisions of Rule 206(4)-2 of the Investment Advisers Act of 1940. You should consult the third-party advisor’s Form ADV Part 2 Brochure to determine: (a) if compensation is payable before the service is provided; (b) when compensation is payable; (c) how you may get a refund on any pre-paid fees; and (d) how you may terminate an advisory contract before its expiration date. A portion of the fees charged to you by the third-party investment advisor is allocated to BRADFORD FINANCIAL SERVICES, INC. and your IAR for introducing accounts to the advisor. In some cases when a client is introduced by BRADFORD FINANCIAL SERVICES, INC., the third-party investment advisor may choose to implement securities transactions through SECURITIES AMERICA, INC. within its capacity as a broker/dealer, with compensation to SECURITIES AMERICA, INC. in the form of directed commissions. Such arrangements shall be fully disclosed to the client.

Item 11 – Code of Ethics

Bradford Financial Services, Inc. has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Bradford Financial Services, Inc. must acknowledge the terms of the

Code of Ethics annually, or as amended.

Bradford Financial Services, Inc. anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Bradford Financial Services, Inc. has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Bradford Financial Services, Inc., its affiliates and/or clients, directly or indirectly, have a position of interest. Bradford Financial Services, Inc.'s employees and persons associated with Bradford Financial Services, Inc. are required to follow Bradford Financial Services, Inc.'s Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Bradford Financial Services, Inc. and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Bradford Financial Services, Inc.'s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Bradford Financial Services, Inc. will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Bradford Financial Services, Inc.'s clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Bradford Financial Services, Inc. and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Haralambos Ignatios Kitsos DBA Bradford Financial Service's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Bradford Financial Services, Inc. will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Bradford Financial Services, Inc.'s clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Haralambos I. Kitsos.

It is Bradford Financial Services, Inc.'s policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Bradford Financial Services, Inc. will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security

is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Bradford Financial Services, Inc. does derive Soft Dollar Benefits. Bradford Financial Services, Inc. is not 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. Bradford Financial Services, Inc. does not directly or indirectly compensate any person for client referrals.

Bradford Financial Services, Inc. or any related person does have authority to determine, without obtaining specific client consent, the: securities to be bought or sold, amount of securities to be bought or sold, broker or dealer to be used, or commission rates paid IF the client has granted Bradford Financial Services, Inc. discretionary authority. Bradford Financial Services, Inc. does not have authority to process the aforementioned transactions IF NOT granted discretionary authority.

Bradford Financial Services, Inc. does suggest a broker to clients. The broker/dealer that I use is Securities America, Inc. . The commissions charged by Securities America, Inc. are the ones charged by me if brokerage services are used through me. The commissions charged by other brokers may be less costly. Clients are free to use other brokerage services whenever they want without any penalty by Bradford Financial Services, Inc..

I am a registered representative of Securities America, Inc. , 12325 Port Grace Boulevard, La Vista, NE 68128. (865) 777-4677. I do financial planning, then recommend products. I derive approximately 50 % of my gross commissions from assets under management through Bradford Financial Services, Inc. and 50 % from commissions from the products that I sell.

Item 13 – Review of Accounts

Bradford Financial Services, Inc. provides financial planning services. This includes looking at net worth, Life Insurance Needs, and Retirement Projections. After an initial financial plan, I review clients' progress approximately every six months or when the client requests a meeting. I charge fees both on an hourly basis and per financial plan. I may also charge annual fees for asset management based on total assets under management for the client. In addition, I am a registered representative of Securities America, Inc. , (broker/dealer based in La Vista, Nebraska) so I receive commissions on the products I sell. Furthermore, I provide no regular reports. The only reviewer is Haralambos I. Kitsos.

Item 14 – *Client Referrals and Other Compensation*

Bradford Financial Services, Inc. does not provide or derive economic benefit from the exchange of client referrals.

Item 15 – *Custody*

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Bradford Financial Services, Inc. urges you to carefully review such statements. Bradford Financial Services, Inc. does not have custody of any client assets and does not provide any statements of these assets.

Item 16 – *Investment Discretion*

Bradford Financial Services, Inc. sometimes receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Bradford Financial Services, Inc. observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Bradford Financial Services, Inc.'s authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Bradford Financial Services, Inc. in writing.

Item 17 – *Voting Client Securities*

As a matter of firm policy and practice, Bradford Financial Services, Inc. does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Bradford Financial Services, Inc. may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Bradford Financial Services, Inc.'s financial condition. Bradford Financial Services, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

At Bradford Financial Services, Inc., the only person that determines investment advice given to clients is Haralambos Ignatios Kitsos. His educational and business background is as follows:

Kitsos, Haralambos Ignatios, D.O.B. 08/28/1969

Education: Merrimack College, Certificate in Financial Planning, 1997-1998

IDS Financial Training Program, 1992-1993

University of Lowell, 1987-1991, BA in English and History

Work Experience:

Securities America, Inc. 2020 to Present

Securities Service Network, 2004 to 2020

Cantella and Company, 1994 to 2004

IDS Financial Services, 1991 to 1994

Personal Tech. Research, 1991 to 1992

Bradford Financial Services, Inc.

Brochure
Supplement
(Form ADV, Part 2B)

April 12, 2018

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bradfordfinancialservices.com

Bradford Financial Services, Inc.

Brochure Supplement (Form ADV, Part 2B)

Haralambos I. Kitsos

April 12, 2018

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bradfordfinancialservices.com

This brochure supplement provides information about Haralambos I. Kitsos that supplements the Bradford Financial Services, Inc. Brochure (ADV Part 2A). You should have received a copy of that Brochure. Please contact Mr. Haralambos I. Kitsos if you did not receive Bradford Financial Services, Inc.' Brochure or if you have any questions about the contents of this supplement.

Item 2: Educational Background and Business Experience

Haralambos I. Kitsos, CFP, born in 1969, graduated with honors from the University of Massachusetts in 1990 with a B.A. in English Literature, History, and a minor in Classical Studies. He has been a financial planner since 1992 when he started his career with IDS Financial Services, a division of American Express. Mr. Kitsos then transitioned to Cantella and Company Inc. in 1994 and spent the next ten years with them as a registered representative, refining his business skills. In 1997, Mr. Kitsos registered as an investment advisor with the Commonwealth of Massachusetts. After 10 years at Cantella and Company, Inc. Mr. Kitsos became a registered representative of Securities Service Network where he was employed until September of 2020 when SSN merged with Securities America. Mr. Kitsos automatically became a rep of Securities America Inc. where he continues to serve in that capacity.

Certified Financial Planner(CFP)

Qualification for a CFP® certification includes two main parts:

1. Complete college or university-level coursework through a program registered with CFP Board, addressing the major personal financial planning areas identified by CFP Board's most recent Job Analysis Study; and
2. Verify that you hold a bachelor's degree or higher from an accredited college or university (accreditation must be recognized by U.S. Department of Education at the time the degree is awarded).
3. Entry into a Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by the CFP board.

CFP® and Certified Financial Planner® are registered trademarks owned by the CFP Board of Standards.

Item 3: Disciplinary Information

There has been no disciplinary action taken against Mr. Kitsos.

Item 4: Other Business Activities

Mr. Kitsos, is a registered representative of Securities America, Inc. , a broker-dealer.

Item 5: Additional Compensation

Mr. Kitsos does not receive any bonus that is based, all or in part, on the number or amount of sales, client referrals, or new accounts. Also, he does not receive any economic benefit from anyone who is not a client for providing advisory services.

Mr. Kitsos does receive commissions from Securities America, Inc., a FINRA registered broker-dealer. Securities America, Inc. , is located at 12325 Port Grace Boulevard, La Vista, NE 68128. As such, the IAR is capable of executing securities transactions through Securities America, Inc. As a result, the IAR may from time to time receive commissions and other payments, including 12(b)-1 fees, generally received with respect to the sale of investment products. As a result, an inherent conflict of interest may exist. . The commissions charged by Securities America, Inc. are the ones charged by me if brokerage services are used through me. The commissions charged by other brokers may be less costly. Clients are free to use other brokerage services whenever they want without any penalty by Bradford Financial Services, Inc. or Mr. Kitsos. The IAR shall fully disclose the receipt of any such commissions or other payments to the Client.

Mr. Kitsos does derive Soft Dollar Benefits. Mr. Kitsos is not 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.

Item 6: Supervision

Haralambos Kitsos' activities are monitored by Security America Incorporated's compliance personnel and supervisory structure. His direct Office of Supervisory Jurisdiction is Steve Palmer at Securities America's compliance department. In addition, Securities America, Inc.'s compliance personnel monitor the management of client accounts.