

Part 2A of Form ADV: Firm Brochure

Brick and Kyle Associates, Inc.

905 Mt. Eyre Road
Newtown, Pennsylvania 18940

Telephone: 215-493-8787

Web Address: www.brickwealthmanagement.com

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This brochure provides information about the qualifications and business practices of Brick and Kyle Associates, Inc. (hereafter "Brick and Kyle"). If you have any questions about the contents of this brochure, please contact us at 215-493-8787.

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 Brick and Kyle also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by our firm's CRD number 107771. The SEC website also provides information about any persons affiliated with Brick & Kyle who are registered as Investment Adviser representatives of the firm.

ITEM 2 – MATERIAL CHANGES

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

A copy of the brochure is available from the SEC website, our website www.brickwealthmanagement.com. or by contacting our office at 215-493-8787.

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ITEM 4 –ADVISORY BUSINESS

Brick and Kyle is a SEC-registered investment adviser with its principal place of business located in Newtown, Pennsylvania. Brick and Kyle was founded in 1984 and was approved as a Registered Investment Adviser in April 1998.

Listed below is the firm's principal shareholder (i.e., those individuals and/or entities controlling 25% or more of this company).

Edgar Wilson Brick, Chairman

Brick and Kyle Associates offers the following advisory services to our clients:

Individual Portfolio Management

Our firm provides asset management of client funds based on the individual needs. Through personal discussions in which goals and objectives based on the client's particular circumstances are established, we develop the client's investment profile. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs and then create and manage a portfolio based on that profile. Clients may impose reasonable restrictions on investing in certain securities, or industry sectors.

Once the client's portfolio has been established, the account is reviewed at least quarterly by an account manager. The frequency of review is dependent upon events which we view as having significant impact on the entire portfolio. Such events would generally include a disappointing earnings report by a portfolio company or a major national or international economic development.

Monthly asset statements denoting market values and a complete listing of all securities held in the portfolio and confirmation statements denoting each individual transaction are provided by our custodian, Charles Schwab & Co.

Our investment recommendations are not limited to any specific product or service and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- ETF's -- Exchange Traded Funds
- Foreign Issuers

- Corporate debt securities (other than commercial paper)
- Municipal securities
- Certificates of Deposit
- Mutual fund shares
- United States governmental securities
- Alternative Investments

Because some types of investments involve certain additional degrees of risk, they will only be purchased when consistent with the client's stated investment objectives, tolerance for risk, liquidity, and suitability.

Financial Planning

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information, and analyses are evaluated to determine their impact on the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides clients with a detailed financial plan designed to assist them in reaching their financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- **Personal:** We review family records, budgeting, personal liability, estate information and financial goals.
- **Tax and Cash Flow:** We analyze the client's income tax and spending and planning for past, current and future years and then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **Investments:** We analyze investment alternatives and their effect on the client's portfolio.
- **Insurance:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **Retirement:** We analyze current strategies and investment plans to help the client achieve their retirement goals.

- **Death and Disability:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **Education Planning:** Review savings needs for children or grandchildren to ensure funds are available to pay for education expenses, including analyzing Coverdell ESA, 529 Savings Plan, Custodial accounts (UGMA/UTMA) and Trust.
- **Estate:** We assist the client in assessing and developing strategies using Trusts, Wills and Powers working closely with the client's legal counsel.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

Typically, the financial plan is presented to the client within one month of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered. All recommendations are of a generic nature.

Seminars

Brick & Kyle conducts pre-retirement and "Planning Your Financial Future" seminars for corporate employees. Seminar topics include tax treatments of lump sum distributions from qualified profit sharing, pension and savings plans as well as insurance needs, estate planning, college funding and general investment strategies. An average of four seminars are performed per year. No fees are charged, and attendees should understand that advice provided to them is general or educational in nature and not designed to provide specific solutions or recommendations.

Brick & Kyle conducts individual counseling sessions for corporate employees and for other individuals. Based on an individual's financial data, a 30-year financial projection is created to assess the individual's financial strengths and weaknesses in his or her retirement years. On average one and a half (1-1/2) hours per individual is spent developing the financial projection.

Assets Under Management

As of 03/31/2021, Brick & Kyle was actively managing \$320,605,200 of clients' assets on a discretionary basis.

ITEM 5 -- FEES AND COMPENSATION

Our annual fees for Portfolio Management Services start at 1.00% of assets under management. Brick and Kyle will negotiate fees on per-client basis. The specific annual fee schedule is identified in the Investment Advisory Agreement between the adviser and each client.

Our fees are billed quarterly and are payable in advance. Each quarterly billing with some exceptions is 25% of the appropriate annual fee applied to the end-of-quarter market value including cash and equivalents. Fees are debited from the account in accordance with the client's authorization in the Investment Advisory Agreement.

A minimum of \$250,000 of assets under management is required for this service. Brick and Kyle may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Financial Planning Fees

Brick and Kyle's financial planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with the client. Our financial planning fees are calculated and charged on an hourly basis at \$250. The length of time it will take to provide the plan depends on the client's personal situation; we provide an estimate at the start of the relationship.

General Information

Termination of the advisory relationship: A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

All mutual funds and Exchange Traded Funds (ETFs) have management fees that are charged within the fund. They generally range from .25% to .9% on ETFs, and from .65% to 1.25% on mutual funds using institutional share classes for mutual funds. Brick & Kyle's advisory calculation will include the value of all mutual funds and ETF's.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Brick and Kyle does not accept performance-based fees.

ITEM 7 -- TYPES OF CLIENTS

Brick and Kyle provides advisory services to the following types of clients:

- Individuals and high net worth individuals
- Pension and Profit-Sharing Plans
- Trusts, Estates
- Charitable Organizations
- Corporations

ITEM 8 -- METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

- Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is undervalued (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

- Technical Analysis. We analyze past market movements and apply that analysis to the present to identify recurring chart patterns of investor behavior and potentially predict future price movement. In this type of technical analysis, we review charts of

market and security activity in an attempt to determine when the market is moving up or down and to predict how long the trend may last and when that trend might reverse.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly managed or financially unsound company may underperform regardless of market movement.

- Cyclical Analysis. In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.
- Asset Allocation. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance. This is based on an analysis of the client's investment profile and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and if not corrected will no longer be appropriate for the client's goals.

Risks for All Forms of Analysis.

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Personal interviews with the client along with information provided help determine our analysis and strategy as well. We also refer to independent research materials, prospectuses, Value Line, Morningstar, Wall Street Journal, Barron's, Kiplinger's and other third-party providers for information and investment analysis.

Investment Strategies

We use the following strategy(ies) in managing client accounts, provided they are appropriate to the needs of the client and consistent with their investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them for a year or longer. Typically, we employ this strategy when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases. When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in an upward price swing in the securities we purchase.

ITEM 9 -- DISCIPLINARY INFORMATION

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and management personnel have no current or pending disciplinary events to disclose.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Investment Advisers of Brick and Kyle Associates are separately licensed as registered representatives of Coastal Equities, Inc., an unaffiliated broker-dealer. These individuals in their separate capacity can affect securities transactions for which they will receive separate, yet customary compensation.

Brick and Kyle endeavors at all times to put the interest of its clients first as part of its fiduciary duty as a registered investment adviser. We take the following steps to address any potential conflicts:

- We disclose to clients that they are not obligated to purchase recommended investments from our employees or affiliated companies.

- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance.
- Our firm's management conducts regular reviews of each client account to verify that all recommendations made to the client are suitable to the client's needs and circumstances.
- We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed.
- We educate our employees through annual continuing education regarding the responsibilities of a fiduciary including the need for having a reasonable and independent basis for the investment advice provided to clients.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Brick and Kyle and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our Code also provides for oversight, enforcement and recordkeeping provisions and includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with making decisions in the best interest of advisory clients and implementing such decisions while at the same time allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

We will aggregate our employee trades with client transactions whenever possible. In these instances, participating clients will receive an average share price. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for his or her personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.

5. We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.
6. We have established procedures for the maintenance of all required books and records.
7. Brick & Kyle does not have any limitations regarding the type of securities to be bought or sold or the amount of securities to be bought or sold. If a client wishes to place restrictions in his/her account as to the type or number of securities to be bought or sold, that request must be written and included with the signed Investment Advisory Agreement upon establishment of the account.
8. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
9. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
10. We have established policies requiring the reporting of Code of Ethics violations to our senior management.
11. Any individual who violates any of the above restrictions may be subject to possible actions which may include enhanced supervision, censure, suspension, or termination.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by calling us at 215-493-8787.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm may be separately registered as securities representatives of a broker-dealer. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

ITEM 12 – BROKERAGE PRACTICES

Brick and Kyle will use block trades where possible and when advantageous to clients. This practice permits the trading of aggregate blocks of securities comprised of assets from multiple client accounts.

Block trading may allow us to execute equity trades in a more timely and equitable manner at an average share price. Brick and Kyle block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with Brick and Kyle, or our firm's order allocation policy.
- 2) The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit and enable Brick and Kyle to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution as well as the best net price.
- 4) Prior to entry of an aggregated order, an order allocation must be completed which identifies each client account participating in the order and the proposed allocation of the order upon completion to those clients.
- 5) If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts in accordance with the initial written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account.
- 6) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order.
- 7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
- 8) Brick and Kyle's client account records separately reflect for each account in which the aggregated transaction occurred the securities which are held by and bought and sold for, that account.

9) Funds and the securities for aggregated orders are clearly identified on Brick and Kyle's records and the custodian handling the transactions by the appropriate account numbers for each participating client.

10) No client or account will be favored over another. Employees participating in the block trade will never get a higher price when selling, or a lower price when buying than the client. All trades are cross-checked the following day to ensure proper execution. If a client did receive a different price than another client, the problem is corrected to give each client the average price.

Brokerage and Best Execution Summary

All investment advisory trades will be placed through Charles Schwab and Co. as custodian unless otherwise directed. Brick & Kyle has no soft dollar arrangements. Soft dollar arrangements include research, products, and client referral. These arrangements could cause a conflict of interest; thus Brick & Kyle chooses not to engage in any such practice.

Brick & Kyle has a fiduciary duty to monitor brokerage services through Charles Schwab & Co. To accomplish this, Brick & Kyle meets every quarter to evaluate trading through Charles Schwab & Co. Several other procedures have been adopted to assure best execution. These include cross-checking every trade, keeping a blotter of executed time stamped trades monitoring Charles Schwab & Co.'s responsiveness to issues such as trade errors and other problems.

ITEM 13 – REVIEW OF ACCOUNTS

Portfolio Management Services

- **Reviews:** The underlying securities within individual portfolio management accounts are continually monitored. Accounts are reviewed monthly in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances or the market, political or economic environment. Reviews are conducted by Andrew W. Brick (President & CEO), Edgar W. Brick (Chairman), Betty Brick (Senior Vice President) and James D. Lewers (Vice President).
- **Reports:** Clients will receive statements from the custodian Charles Schwab & Co. reporting transactions occurring in the account at least on a quarterly basis. Clients will also receive trade information on all buys and sells. The statements will be paper or electronic depending on the client's selection. You must notify us of any discrepancies or concerns you have about the account.

Financial Planning Services

- Reviews: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for financial planning clients unless otherwise contracted.
- Reports: Financial planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

It is Brick and Kyle's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm. Our policy does not allow our related persons to accept any form of compensation, including cash, sales awards, or other prizes from a non-client in conjunction with the advisory services we provide to our clients.

ITEM 15 – CUSTODY

Our firm does not have actual or constructive custody of client accounts as all assets are held at Charles Schwab & Co. who provide account statements directly to clients at their addresses of record or electronically at least quarterly. Clients will receive security trade confirmations, consolidated year end statements and any related tax forms as applicable.

The Investment Advisory Agreement authorizes Brick & Kyle to debit client accounts for quarterly management fees in accordance with current SEC custody rules. Clients should review their account statements and verify the fee debited is correct.

Certain clients have established asset transfer authorizations which permit Charles Schwab to rely upon instructions from the client to transfer funds or securities to first and third parties. These arrangements are in accordance with guidance provided in the SEC's Investment Advisor Associate No-Action letter and are not subject to an annual surprise CPA examination.

ITEM 16 – INVESTMENT DISCRETION

Clients give us discretionary authority when they sign an Investment Advisory Agreement with our firm and may limit this authority by providing written instructions. This discretion allows us to place trades without contacting the client prior to obtaining permission. Our discretionary authority includes the ability to do the following:

1. Determine the security to buy or sell;
2. Determine the amount of the security to buy or sell.

ITEM 17 – VOTING CLIENT SECURITIES

We do not and will not accept the proxy authority to vote client securities. All clients are directed to receive proxies or solicitations directly from Charles Schwab & Co. or the transfer agent. Clients may contact us directly to discuss questions they have about proxy votes or other solicitations.

ITEM 18 – FINANCIAL INFORMATION

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that are likely to impair our ability to meet our contractual obligations.

Brick & Kyle has no financial commitment that would impair our ability to meet contractual and fiduciary commitments and has not been subject to bankruptcy proceedings at any time during the past thirty years.