

Item 1. Cover Page

Longbow Asset Management Company
CRD # 126193

401 South Boston Avenue, Suite 100
Tulsa, Oklahoma 74103

Phone - (918) 295-9929
Email - contact@lbamc.com
Website - www.lbamc.com

March 31, 2021

This Form ADV Part 2A (the “Brochure) provides information about the qualifications and business practices of Longbow Asset Management. If you have any questions about the contents of this brochure, please contact us at (918) 295-9929 or contact@lbamc.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any other state securities authority.

Longbow Asset Management is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Longbow Asset Management is available on the SEC’s Website at www.adviserinfo.sec.gov.

The searchable IARD/CRD number for Longbow Asset Management is # 126193.

Item 2. Material Changes

Longbow Asset Management
Form ADV, Part 2A
Updated on March 31, 2021

The Material Changes for this Form, ADV Part 2 Update relate to Longbow Asset Management transitioning from a State registered investment advisor to a SEC registered investment advisor.

Information on supervised persons previously found under Item 19 is now in the Part 2B Brochure Supplement.

An explanation of the minimum qualifications required for the CFA charterholder professional designation have been added as follows:

Chartered Financial Analyst (CFA) Designation

A professional designation issued by the CFA Institute which measures the competence and integrity of financial analysts. Candidates are required to pass three levels of exams covering areas such as accounting, economics, ethics, portfolio management and security analysis. The CFA Program is organized into three levels, each culminating in a six-hour exam. Completing the Program takes most candidates between two and five years but candidates can take as long as needed to complete the program and there is no limit to the number of times each exam can be taken. Each candidate is required to have four years of qualified experience to earn the designation.

The firm's Privacy Policy previously in Item 20 is now in Appendix I to Part A of this Brochure.

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Item 4. Advisory Business

- A) Longbow Asset Management based in Tulsa, Oklahoma was founded and commenced operations on September 30, 2003.

Longbow's co-owners and founders are Dwight Bottomley and Michael J. (Jake) Dollarhide.

- B) Longbow develops investment strategies to meet our clients' financial goals. Our investments strategies are created based on conversations with our clients about their current financial position, long term goals, risk tolerance, and income needs.
- C) Longbow seeks to customize each and every client relationship (to the scope and point that customization is necessary and possible) to build investment portfolios consistent with each client's risk and reward preferences as well as overall suitability based on each client's overall age, demographic, financial, and investment goal situation. Additionally, clients may impose restrictions on investing in certain securities and types of securities at anytime.
- D) Longbow does not currently participate (and has not ever participated) in any wrap-fee programs.
- E) As of December 31, 2020, Longbow managed \$114,482,317 assets under management (AUM) with \$107,796,628 on a discretionary basis and \$6,685,689 on a non-discretionary basis.

Item 5. Fees and Compensation

- A) Our standard fee is an annual percentage of the market value of the client account. At the end of each quarter, the firm calculates in arrears the portfolio's asset management fee using market values for the last day of the calendar quarter as determined by the portfolio's custodian or a third party pricing service such as Interactive Data Corporation (IDC).

The firm's standard annual fee rate is 1%. The fee is negotiable. In some cases, depending on circumstances, the firm may agree to be compensated by a fixed fee or by a custom tiered fee schedule.

A client's specific fee schedule is established in the client's written investment advisory agreement with our firm.

- B) Clients may choose to either authorize our firm to debit our management fee directly from an investment account or to pay by check, according to preference. Clients select their billing method with Longbow at the beginning of the investment advisory relationship and may change it at any time.

Billing will commence as of the date of the investment advisory agreement between the client and the firm. Generally, households with more than \$250,000 in assets are billed quarterly while those with less than this amount are billed semi-annually.

- C) Longbow'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-dealers and other third parties. Mutual funds and exchange traded funds charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are incurred directly by the client.
- D) Clients do not pay any fees in advance.
- E) Longbow does not compensate its employees for the sale of securities or other investment products.

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

Longbow does not accept or implement performance-based fees and we do not receive any compensation in connection with the purchase and sale of securities including commissions from load funds.

Item 7. Types of Clients

Longbow's manages accounts for individuals, families, trusts, endowments, corporations, individual retirement accounts (IRAs), 401(k) Plans, other retirement plans, 529 Plans, custodial accounts, other organizational accounts, and charitable accounts.

The minimum account size for opening an account with Longbow is \$250,000. Our firm may waive this minimum based on circumstances including, but not limited to the total assets managed for a household, age, and the future earnings potential of a client.

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

A) Analysis

1) Equity – Our firm uses fundamental analysis to identify and select attractively priced securities. The quality of earnings is determined by using various measures, including: return-on-equity, profit margins, debt ratios, and cash flow. Valuation is analyzed using various multiples including price to earnings, price to book, and price to sales.

To reduce risk, we diversify across economic sectors and avoid taking concentrated positions. Regardless of the measures we take to reduce risk, investing in equity securities involves risk of loss which clients should be prepared to bear.

2) Fixed Income - Our fixed income portfolio seeks current income and capital safety by investing in a diverse mix of debt instruments including government bonds, corporate bonds, and preferred securities.

Historically, due to their fixed payment structures, bonds have offered lower risk than other investment vehicles such as equities. They are, however, by no means risk free. A variety of factors affects their performance, some severely, and all should be closely monitored and controlled.

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

B) Risk

Investors in any security class, whether equities, fixed income or any other security types, face many risks and an investor's portfolio is always subject to realized and unrealized losses in any asset class.

1) Common stocks (and other equity securities) have historically experienced great risk measured by price volatility, the standard deviation of annual returns. The client understands that the firm cannot eliminate unique (company specific) or systemic (market) risk for any common stocks. The firm will attempt to diversify these risks but there is no guarantee that the firm will be able to do so.

2) Fixed income investing is no protection or guarantee from the reality of loss of principal, whether or not inflationary effects are considered. Additionally, with fixed income securities, the firm cannot eliminate interest rate risk, credit risk, default risk, reinvestment risk or any other associated risks.

Item 9. Disciplinary Information

None.

Item 10. Other Financial Industry Activities and Affiliations

None.

Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

- A) Code of Ethics - our firm has adopted and strictly adheres to the Code of Ethics and Standards of Professional Conduct set forth by the Chartered Financial Analyst (CFA®) Institute. These guidelines clearly delineate right from wrong, thus eliminating 'gray areas' that may arise by providing a strict reference point.

We will provide a copy of our code of ethics to any clients or prospective client upon request.

- B) Our firm may buy or sell securities for client accounts in which the firm and its owners (officers), directors, employees and related persons have a material financial interest.
- C) Longbow Asset Management, Dwight T. Bottomley, Michael J. Dollarhide, and other employees of Longbow may buy and sell securities that we also recommend to clients with the understanding that client accounts take precedence (and are filled first in the case of block orders for example) over any Longbow related accounts, including corporate accounts or the individual accounts of any officers or employees of the firm.

Item 12. Brokerage Practices

A) Brokerage

Longbow's primary broker-dealer and custodian is Charles Schwab and Co., Inc., but since our firm is an independent investment advisory firm we have the ability to manage a client's account at practically any broker-dealer and the client always has the final say in where their account is held and managed by our firm.

Most all trades in client accounts are executed by the custodian of the account such as Charles Schwab. However, from time to time, when opportunities exist to execute trades at prices favorable for the accounts of clients and superior to potential execution prices offered by the client's custodian, Longbow may execute trades with third party brokerage firms, that is, brokerage firms that do not act as custodian for accounts of clients.

In all cases, Longbow has the fiduciary responsibility to achieve the best possible execution price and negotiate the most favorable commission rates on all trades executed for clients.

- 1) Longbow does not receive research or other products or services other than execution from broker-dealers or other third parties in connection with client securities transactions.
- 2) Longbow does not engage in client referral relationships with any broker-dealers.
- 3) Longbow does not participate in directed brokerage arrangements.

B) Order Bunching

On some occasions we aggregate (or bunch) the purchase and sale of equity and fixed income securities for various client accounts in order to achieve the best execution and the most favorable prices for our client accounts.

Additionally, there are many occasions in which we do not aggregate (or bunch) the purchase and sale of equity and fixed income securities for client accounts (particularly when we invest on an account-by-account basis for

portfolio customization purposes). When purchase and sell orders that are not “bunched” some clients will most likely receive different execution prices than other clients (depending on market conditions and price fluctuations).

Additionally, securities may be purchased and sold for one client’s portfolio, but not be purchased and sold for another client’s portfolio, even though both portfolios have the same investment objectives and the same size. Also, the percentage of any asset in any portfolio or account may differ from one another. Likewise, the asset allocation or monetary commitment between different types of securities, i.e. the allocation among assets, may differ from one portfolio to another, or from one account to another, or both portfolio and account. Finally, the timing of purchases and sales of identical securities may differ among clients of the firm and securities which are purchased by or sold for the officers, shareholders, and employees of the firm, may or may not be purchased and sold for the client.

Item 13. Review of Accounts

- A) Supervisory persons at Longbow monitor the securities that comprise our client accounts at various times daily. Additionally, Longbow reviews all client accounts on a weekly, monthly and quarterly basis as we seek to monitor proper diversification, security selection and performance, client cash requirements and the reinvestment of sold, called, or matured securities.

Jake Dollarhide (Chief Executive Officer) and Dwight Bottomley (President) are the firm’s supervisory persons that conduct the client account reviews.

- B) Anytime a client asks a question, authorizes a purchase or sell of a security, makes a request, or the firm sets up a portfolio review with a client, then that client’s accounts are reviewed in addition to the normal periodic scheduled reviews.
- C) Besides the account statements that the client’s custodian provides to the client, Longbow sends reports on a quarterly or semi-annual basis by mail that include unrealized gains and losses and performance reports.

Item 14. Client Referrals and Other Compensation

- A) Economic Benefits Provided by Third Parties for Advice Rendered to Clients

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

- B) Compensation to Non-Advisory Personnel for Client Referrals

Longbow does not directly, or indirectly, compensate any person for client referrals who is not a Longbow registered investment advisor representative.

Item 15. Custody

Under to the SEC’s Custody Rule, our firm is deemed to have custody anytime a client authorizes our firm to directly debit fees and for third-party money movements (checks and journals, MoneyLink/ACH, and wires).

For first-party money movements we require clients to sign an authorization including destination account details. Under these circumstances, first-party money movements do not trigger custody.

In every case, a qualified custodian sends monthly or quarterly statements directly to clients and clients should carefully review those statements. Additionally, Longbow sends quarterly or semi-annually account statements to clients as well. Longbow advises clients to carefully review and compare official custodial records to the account statements provided by our firm.

Item 16. Investment Discretion

Longbow accepts “discretionary authority” to manage securities accounts on behalf of clients. In most cases, the client authorizes the firm to place any buy and sell orders it sees fit according to the agreed upon asset allocation and overall investment strategy as well as to give investment and settlement instructions for the portfolio via phone, facsimile, or electronically to the custodian or respective broker-dealer that execute the investment orders. The client also authorizes the firm to arrange for any other function necessary to manage the portfolio, including but not limited to the selection of custodians, brokers, and other entities used to hold assets, execute transactions, and perform all other functions for the client’s account.

In order for Longbow to have “discretionary authority” on a client’s account, the client must sign a power of attorney on his/her account with their respective broker-deal or custodian in order to grant that power to Longbow.

Item 17. Voting Client Securities

In most cases, Longbow will accept the authority to vote client securities via proxy vote (assuming the client chooses to grant us such authority). In all proxy situations, the firm, as the investment manager, has a duty to make independent proxy decisions and to decide with objectivity what is in the best interests of the beneficiaries for whom a proxy is voted (e.g., the client). At all times, client proxies will be voted and accurate proxy voting records will be maintained.

At anytime a client may obtain information from Longbow about how we voted on their respective securities and clients may obtain a copy of our proxy voting policies and procedures upon request.

Item 18. Financial Information

Longbow does not require or solicit pre-payment of fees from clients and Longbow has not been the subject of a bankruptcy petition during the past ten years (or at anytime during its operating history).

Appendix I - Privacy Policy

At Longbow Asset Management, your privacy is our priority. Our privacy policy applies to individuals, businesses, trusts, foundations, retirement plans, or any other entities or organizations who are current, former, or prospective clients or who register for one of our services or promotional offers.

Our privacy policy is as follows:

- 1) We do not sell your personal information to anyone. We do not disclose and we do not reserve the right to disclose Non-Public Information.**
- 2) The law allows you to “opt out” of only certain kinds of information sharing with third parties. Longbow does not share personal information about you with any third parties that triggers this right to opt out. This means that YOU ARE ALREADY OPTED OUT.**
- 3) We collect personal information in the normal course of business in order to administer your accounts and use it to deliver the best possible service to you. Specifically, we collect your home address and telephone numbers, employment status, date of birth, social security number, family information, and bank account numbers.**
- 4) We protect the confidentiality and security of your personal information.**
- 5) If at anytime in the future our privacy policy changes, we will provide notice of those changes to you in our information-sharing policies.**

Additionally, companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. Furthermore, we limit their use of your personal information to the performance of the specific service we have requested.

We restrict access to personal information to our employees and agents for business purposes only. All employees are trained and required to safeguard such information.

We maintain physical, electronic, and procedural safeguards to protect your personal information. If you have any questions or concerns, please call our office at 918-295-9929 or contact us by e-mail at admin@lbamc.com.

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Item 1. Cover Page

Brochure Supplement (Part 2b of Form ADV)

Longbow Asset Management Company

401 South Boston Avenue, Suite 100
Tulsa, Oklahoma 74103

Phone - (918) 295-9929

Firm Brochure Supplement

March 31, 2021

Supervised Persons:

M. Jake Dollarhide
(918) 295-9929

401 South Boston Avenue, Suite 100
Tulsa, Oklahoma 74103

Dwight Bottomley
(918) 895-9730

Korvettvägen 6
Halmstad, Sweden 302 72

This brochure supplement provides information about the above listed supervised persons that supplements the Longbow Asset Management brochure. You should have received a copy of that brochure. Please contact M. Jake Dollarhide at 918 295 – 9929 if you did not receive Longbow Asset Management’s brochure or if you have any questions about the contents of this supplement.

Professional Certification Definitions

Chartered Financial Analyst (CFA) Designation

A professional designation issued by the CFA Institute which measures the competence and integrity of financial analysts. Candidates are required to pass three levels of exams covering areas such as accounting, economics, ethics, portfolio management and security analysis. The CFA Program is organized into three levels, each culminating in a six-hour exam. Completing the Program takes most candidates between two and five years but candidates can take as long as needed to complete the program and there is no limit to the number of times each exam can be taken. Each candidate is required to have four years of qualified experience to earn the designation.

Michael J. (Jake) Dollarhide

Born 1974

Item 2 – Educational Background and Business Experience

Education Background:

University of Tulsa; Tulsa, Oklahoma

- Bachelor of Science Business Administration Finance, (with a Minor in Economics) 1997

University of Tulsa; Tulsa, Oklahoma

- Masters of Business Administration, 2002

Business Experience:

- 9/30/2003 to Present
Chief Executive Officer, Chief Compliance Officer, Investment Advisor Representative
Longbow Asset Management
- 1997 to 9/30/2003
Chief Operating Officer
Fredric E. Russell Investment Management Co., Tulsa, Oklahoma
- 1996 to 1997
Assistant Portfolio Manager
Fredric E. Russell Investment Management Co., Tulsa, Oklahoma

Item 3 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this item.

Item 4 – Other Business Activities

Michael J. (Jake) Dollarhide does not engage in any other investment related business or occupation.

Item 5 – Additional Compensation

No information is applicable to this item.

Item 6 – Supervision

Michael J. (Jake) Dollarhide is Chief Executive Officer of Longbow and is responsible for his own supervision.

Supervisory contact information: (918) 295-9929

Dwight Bottomley, CFA Born 1976

Item 2 – Educational Background and Business Experience

Education Background:

University of Tulsa; Tulsa, Oklahoma

- Bachelor of Science Business Administration Finance, 1999

University of Tulsa; Tulsa, Oklahoma

- Chartered Financial Analyst (CFA), 2005

Business Experience:

- 9/30/2003 to Present
President, Investment Advisor Representative
Longbow Asset Management, Tulsa, Oklahoma
- 6/30/2006 to 9/30/2013
Consultant
Everest Asset Management AG, Zurich, Switzerland
- 4/30/2004 to 6/30/2006
Consultant
Alpine Atlantic Asset Management AG, Zurich, Switzerland
- 6/30/1999 to 2/28/2003
Portfolio Manager, North American Equities
Von Ernst Performa AG, Vaduz, Principality of Liechtenstein
- 9/30/1997 to 5/31/1999
Assistant Portfolio Manager
Fredric E. Russell Investment Management Co., Tulsa, Oklahoma

Item 3 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this item.

Item 4 – Other Business Activities

Dwight Bottomley is a U.S. citizen and a full-time resident of Sweden. He is not engaged in any other investment related business or occupation. He serves as Managing Director of West Coast Data Designs AB, a Swedish company established for income tax purposes.

Item 5 – Additional Compensation

No information is applicable to this item.

Item 6 – Supervision

Dwight Bottomley is President of Longbow and is responsible for his own supervision.

Supervisory contact information: (918) 895-9730