BRYAN ADVISORY SERVICES, LLC BROCHURE

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BROCHURE

December 1, 2023

Bryan Advisory Services, LLC 125 Technology Drive, Suite 105 Canonsburg, PA 15137

This brochure provides information about the qualifications and business practices of Bryan Advisory Services, LLC.

If you have questions about the contents of this brochure, please contact us at 724-746-4004 or Rick@Bryaninvestment.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Bryan Advisory Services, LLC is also available on the SEC's website at www.advisorinfo.sec.gov. Bryan Advisory Services, LLC is a Pennsylvania registered investment advisor. Registration as an investment advisor does not require a specified level of skill or training.

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Brochure last updated: 3/31/2022

Item 2 Material Changes

This section of the brochure helps you identify material changes from the last annual update.

Under direction of recent regulatory notice, this is Form ADV Part 2 for Bryan Advisory Services LLC in a new narrative format. Please review all parts of it because it describes important details about us and the services we provide.

In addition, we have made some changes to our fee structure to allow, along with fee adjustments, our ability to provide services with commissions providing an offset to regular fee charges.

Item 3 — *Table of Contents*

Material Changes (Item 2) 2

Advisory Business (Item 4) 4

- Types of Advisory Services 4
- Types of Investments Used 4
- Tailored Services and Investment Restrictions 5
- Assets Under Management 5

Fees and Compensation (Item 5) 5

- Compensation Methodology and Rates 5
- How Clients Pay Advisory Fees 6
- Other Types of Fees and Expenses 6
- Investment Company Fees 6

Performance-Based Fees and Side-By-Side Management (Item 6) 7

- Side-By-Side Management 7

Types of Clients (Item 7) 7

- Individuals 7
- Pension Plans 7

Methods of Analysis, Investment Strategies, and Risk of Loss (Item 8) 7

- Methods of Analysis 7
- Investment Strategies 7
- Risks 8

Disciplinary Information (Item 9) 9

Other Financial Industry Activities and Affiliations (Item 10) 10

Code of Ethics, Participation/Interest in Client Transactions, Personal Trading (Item 11) 10

- Code of Ethics 10
- Material Financial Interest and Personal Trading 10

Brokerage Practices (Item 12) 10

- Factors Considered When Recommending Broker-Dealers 11

Review of Accounts (Item 13) 11

- Reviews 11

Reports 12
Client Referrals and Other Compensation (Item 14) 12
Referral Relationships 12
Custody (Item 15) 12
Investment Discretion (Item 16) 12
Voting Client Securities (Item 17) 12
Financial Information (Item18) 12
Prepayment of Fees 13
Privacy Statement 13
Requirements for State-Registered Advisors (Item 19) 13
Exhibit I 15

Item 4 - *Advisory Business*

This section of the brochure tells you about our business, including ownership and a description of the services we offer.

Bryan Advisory Services, LLC is referred to in this document as "BAS", "the Company", "us", "we", or "our". In this document we refer to current and prospective clients of Bryan Advisory Services as "you", "client", or "your". Bryan Advisory Services was established legally in 2010. Richard G Bryan Jr. is the sole and managing member of the LLC and has a history of investment counseling beginning in 1981 with Bryan Funding, Inc., a registered brokerage firm.

Types of Advisory Services

All clients enter into a written Investment Advisory Agreement where BAS and our investment adviser representatives provide asset management services on a continuous and ongoing basis guided by the individual needs of the client. Using the information provided by you, the investment advice provided to you is tailored to your individual situation. We regularly inquire about, and you are responsible for providing, information about your investment goals, time horizon, and risk tolerance. These investment supervisory services are not generally provided to all your holdings or net assets but rather to specific assets designated by you and accepted by us as managed assets.

Portfolio Management

Bryan Advisory Services LLC provides portfolio management of client funds based on the individual needs of the clients. We establish the client's personal investment policy through personal discussions in order to determine goals and objectives. We create and manage the portfolio based on the clients' particular circumstances. During the initial discussion, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we may also review and discuss a client's prior investment history.

We manage these accounts on a discretionary basis unless otherwise noted. Clients choosing us to provide investment advisory services sign an agreement giving us the authorization to effect security transactions on behalf of their portfolio. Discretionary client portfolios may invest in equities, fixed income, open or closed end mutual funds exchange trades funds (ETFs) or a combination of the above depending on the investment strategy chosen by the client.

Pension Consulting Services

BAS offers consulting services to pension or other employee benefit plans. For some clients we provide financial projections to assist them in their retirement planning. Any reports, financial statement projections, and analyses are intended for your use in developing and implementing your financial plan. Because of this limited purpose, the projections should not be considered a complete financial plan for you. Bryan Advisory Services will not audit, review, or compile financial statements. We will not express an opinion or other form of assurance regarding the reasonableness of assumptions and other data which may be used by others for prospective financial statements. There will likely be material differences between projected and actual results because events are variable and circumstances frequently do not fit predictions.

Our analyses will be highly dependent upon certain economic assumptions about the future. Therefore, you should establish familiarity with the historical data regarding key assumptions such as inflation and investment rates of return, as well as an understanding of how these assumptions affect the results of our analysis. We may counsel you about the consistency of your assumptions when applying relevant historical data but we will not express assurance as to the accuracy or reasonableness of your data and assumptions. You are ultimately responsible for the assumptions and personal data upon which we base projections. The reports are not intended to, nor do they provide a guarantee about future events including your investment returns. The implementation of the plan is your responsibility.

Bryan Advisory Services does not provide comprehensive financial planning. The Portfolio Management for our clients is limited to and focused upon investment and retirement planning. Risk management issues such as life, health, disability, and long-term care insurance are not usually addressed and you will be encouraged to seek professional help in these areas. Additionally, BAS does not provide tax or legal advice but we may suggest transactions or investments for their tax benefits.

Types of Investments Used

We will consider many types of securities when formulating our investment advice to you. If you come to us with existing investments, we evaluate them in relationship to your financial goals, risk tolerance, and time horizon. Depending upon your situation, your account(s) managed by us may contain individual stocks, corporate/government bonds, treasuries, mutual funds, variable annuities, variable life insurance, or exchange traded funds ("ETF's").

Non-correlated Investments

We may suggest non-correlated mutual funds or ETF's. Non-correlated mutual funds or ETF's may rise in value during general stock market declines and move down in an up market. We may use these non-correlated assets in an attempt to reduce volatility in your portfolio. The use of this strategy does not guarantee that the volatility, draw down, or loss of portfolio principal will be less and it may actually reduce long term performance.

Wrap Fees

A wrap account is a professionally managed investment plan in which all expenses, including brokerage commissions, management fees and administrative costs are "wrapped "into a single charge. BAS does not offer wrap fee services.

Tailored Services and Investment Restrictions

We attempt to tailor your investment portfolio to your situation as you have described it to us. It is important that you let us know when you have changes to your financial situation, goals, or investment time horizon.

You may place restrictions upon our selection of investments, and it is important that you document this in written form to us. We will respect your wishes and maintain our communication about your portfolio.

Assets Under Management

As of November 2023 Bryan Advisory Services has managed $1,773,693 of client assets on a discretionary basis. The number of client assets Bryan Advisory Services manages on a non-discretionary basis is zero.

Item 5 - *Fees and Compensation*

Fees and Compensation

This section of the brochure describes how we are compensated for the services we offer.

Compensation Methodology and Rates

Assets Under Management

Clients are typically charged for our asset management services based on a percentage of the assets being managed. The following fee schedule is our basic fee arrangement for investment supervisory services. Your specific annual fee arrangement will be described in the written Investment Advisory Agreement entered into between BAS and you. Investment advisory fees charged by us are negotiable and are established by agreement with you. All clients do not pay the same fee.

Assets Under Management	Annual Rates
First $2,000,000	1.00%
$2,000,000 to $8,000,000	0.75%
Above $8,000,001	0.50%

Duties that do not include asset allocation and require limited investment advice will have a minimum annual rate of 0.30%. Consultant evaluations will be charged at an annual rate of 0.10%. Depending on the agreement with the client, the annual fee for our services is

billed either monthly or quarterly in arrears based on the value of the account at the end of the month or quarter. If the management agreement does not span the entire billing period, the fee will be pro-rated based on the number of days the account is open during the billing period. Your account custodian will send you a statement, at least quarterly, showing all disbursements including any advisory fee if authorized by you in writing. We share responsibility with you to verify the accuracy of the fee calculation because the custodian will not determine that the fee has been properly calculated. We will send you a written invoice itemizing the fee, including any formulae used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based. Please see Item 12 (Brokerage Practices) in this brochure for more information about your account custodian(s).

You may terminate the Investment Advisory Agreement without fee or penalty by providing written notice to Bryan Advisory Services within five (5) business days from the execution of our agreement. After that time, either you or we may terminate the arrangement by giving written notice. Any fees collected in advance of service will be returned to you on a pro rata basis and any fees due will be billed to you.

How Clients Pay Advisory Fees

The following information describes how Bryan Advisory Services, LLC is compensated for the advisory services that it provides to each client account. Unless otherwise specified below or in the advisory contract that BAS enters into with a particular client, Bryan Advisory Services will bill in arrears either on a monthly or quarterly basis. At the end of each month or quarter a calculation will be made based on the assets under management and the fees will be deducted by the custodian from the clients' money market account. Any collected but unearned fees will be refunded to you.

Other Types of Fees and Expenses

In addition to our fees, you may pay transaction fees to your custodian or broker-dealer for executing securities transactions. There may be other possible charges for special services elected by you or us in the active management of the account. These fees may include:

periodic distribution fees	electronic fund and wire transfer fees
certificate delivery fees	reorganization fees
account transfer fees (outbound)	international security transfer fees
overnight mail and check fees	transfer agent fees.

This list is not meant to be all inclusive. Any fee on a special service incurred by the client will be fully disclosed. Please refer to Item 12 of this document for an explanation of our brokerage practices.

Investment Company Fees

Investment company funds (mutual funds or ETF's) that are held by you will bear their own internal transaction and execution costs, as well as direct compensation to their investment managers along with internal administration costs. Some funds pay 12b-1 fees, and /or shareholder service fees to broker-dealers that offer investment company funds. These fees affect the valuation of your shares and are indirectly a cost to you.

Some fund companies have a redemption fee. A redemption fee is charged to a shareholder when the shares are sold or redeemed within a stated period of time from the purchase date. Although a redemption fee is deducted from redemption proceeds like a deferred sales load, it is not considered to be a sales load. Unlike a sales load, which generally is used to compensate broker-dealers, this kind of fee is used to defray fund costs associated with the redemption and is paid directly to the fund, not to a broker. The SEC generally limits redemption fees to 2%. We will not ordinarily sell your shares in a period when there would be a redemption charge. However, the issue may come up if you request liquidation.

A more complete explanation of these charges is part of any Prospectus and Statement of Additional Information supplied by the investment company fund. We suggest that you obtain a Prospectus for your fund either through us or directly from the investment company through their website, by telephone, or by mail.

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

Performance-Based Fees and Side-By-Side Management

This section of the brochure explains any performance-based fees we charge.

Bryan Advisory Services does not charge fees based upon a share of capital gains or capital appreciation of client assets. Our advisory fees are only charged as mentioned above in Item 5. BAS does not offer side by side management services.

Item 7 - *Types of Clients*

Types of Clients

This section of the brochure describes our clients.

Bryan Advisory Services provides investment advisory services to a variety of clients including trusts, foundations, business organizations, and individuals. There is an account minimum of $500,000 which may be waived by the investment advisor depending on the situation.

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

Methods of Analysis, Investment Strategies, and Risk of Loss

This section of the brochure explains how we formulate our investment advice and manage client assets.

Methods of Analysis

Modern Portfolio Theory

As part of our analysis of portfolio structure, we use a method called modern portfolio theory. Modern Portfolio Theory ("MPT") is a theory of investment that tries to maximize an investment portfolio's expected return for a given amount of portfolio risk. (Risk is defined as volatility of the value of the portfolio.) The analysis might also attempt to minimize risk for a given level of expected return. We attempt to do this by carefully choosing the proportions of various assets in an investment portfolio.

MPT is a mathematical formulation of the concept of diversification in investing, with the goal of selecting an assortment of assets that has collectively lower risk than any individual asset. MPT models an asset's return as a normally distributed function, defines risk as the standard deviation of return, and models a portfolio as a weighted combination of assets so that the return of a portfolio is the weighted combination of the assets' returns. By combining different assets whose returns are not perfectly positively correlated, MPT seeks to reduce the total variance of the portfolio return. MPT assumes that investors are rational, markets are efficient, and that the future performance of investments will have some similarity to their historical performance. These assumptions can be problematic and may not be true in the real time activity of the markets. Black swans happen and force us to humility and the realization that past performance is not always indicative of future performance. This realization is not fatal to our efforts to manage risk and we work for you by staying alert to the vagaries of real life portfolio management without blind adherence to theory.

Investment Strategies

We tend to build our investment portfolios using MPT. We construct portfolios along the risk spectrum from more conservative to more aggressive. The more conservative portfolios will generally be constructed with less equity-like investments while the more aggressive portfolios will generally hold more equity-like investments. To implement the strategies, we may utilize individual stocks and bonds or, more commonly, your portfolio manager will research and select from the universe of mutual funds and ETF's to build your portfolio.

Our methods for researching and analyzing prospective selections for your portfolios are both quantitative and qualitative. We encourage you to speak directly with us to understand how we choose investments for you and the rationale that led us to your allocation of assets.

We, at all times, seek to provide you with transparency regarding our methods and pursue your interests first with disclosure of any possible conflict of interests.

Risks

General Risks

Investing is not without risk and it involves the risk of principal loss, which you should be prepared to face if it happens. We attempt to reduce risk in your portfolio by diversifying it across multiple asset classes.

Nevertheless, historical evidence shows that every asset class has experienced severe declines in value, even sustained over many years. Our strategy to minimize risk may not succeed because the benefits of diversification decline if asset classes become more correlated. Additionally, security prices can be affected substantially when exchanges are closed due to company specific news or macroeconomic/geopolitical conditions and events.

As with any investment, you could lose all or part your investments managed by Bryan Advisory Services and your account's performance may be less than other investments.

Asset Class Risk

Securities in your portfolio(s) or in underlying investments such as mutual funds may under perform in comparison to the general securities markets or other asset classes.

Concentration Risk

To the extent that Bryan Advisory Services recommends portfolio allocations that are concentrated in a particular market, industry, or asset class, your portfolio may be susceptible to loss due to adverse occurrences affecting that market, industry, or asset class.

Management Risk

The performance of your account is subject to the risk that our investment management strategy may not produce the intended results.

Market Risk

Your account could lose money over short periods due to short-term market movements and over longer periods during market downturns. The value of a security may decline due to general market conditions, economic trends, or events that are not specifically related to the issuer of the security or to factors that affect a particular industry or industries. During a general downturn in the securities markets, multiple asset classes may experience loss.

Passive Investment Risk

Bryan Advisory Services may use a passive investment strategy that is not actively managed where we do not attempt to take defensive positions in declining markets.

Regulatory Risk

Changes in government regulations may adversely affect the value of a security. An insufficiently regulated industry or market might also permit inappropriate practices that adversely affect an investment.

Smaller Company Securities Risk

Securities of companies with smaller market capitalizations have historically tended to be more volatile and less liquid than larger

company stocks. Smaller companies may have no or relatively short operating histories or are new public companies. Additional risks are inherent if they have aggressive capital structure, high debt levels, or are active in growing/changing industries and new technologies.

Key Man Risk

We are a small firm with one person, Richard G. Bryan, who performs many critical functions. This fact leads to "key man risk", the risk that something could happen to Mr. Bryan that negatively affects your portfolio. We are in the planning stage of bringing coverage of some functions to help reduce this risk. BAS has several investment advisors two of which also hold an insurance license.

Small Firm Risk

We are reliant on research from leading national firms to assist us in our investment decisions. Additionally, we do not have the level of financial resources that larger firms have to invest in market data systems or industry consultants to provide insight on specific companies or industries in which we may invest. We have been associated with these firms over the years and now bring our experience and educated selective attention to the work of your investment management. We use a filtered perspective from the big firms to come to our own determinations.

Private Placement Risk

~It may take many years, if ever, for developmental wells drilled to produce sufficient revenue to return the amount of your investment.
~Deductions of IDC and tangible costs occur over the first few years of the program as wells are being drilled and completed.
~ The revenues are directly related to marketing the natural gas and oil. Gas and oil prices are volatile and cannot be predicted. If these prices decrease, your investment return will also decrease.
~Wholesale buyers of natural gas may experience financial difficulties and be unable to pay for natural gas at market prices.
~ If you invest as an Investor General Partner, you will have the liability during the drilling of the wells for Partnership obligations. Investing partners who purchase units of general partnership interests, thereby becoming General Partners, will be jointly and severally liable for all liabilities and obligations of the Partnership. One or more General Partnership unitholders may be held liable for more than their pro rata share of the Partnership liabilities. After the drilling phase, you will be converted by the Managing General Partner to a Limited Partner.
~The tax option may not cover certain allocations of the federal income tax deductions. This could possibly increase the risk that a portion of the intangible drilling costs may be disallowed in the event of an IRS audit.
~Changes in tax laws may reduce the tax benefits of your investment in the Partnership.
~You are committing to complete reliance on the Managing General Partner and its affiliates.
~Each partnership will also pay substantial fees to the Managing General Partner and affiliates.
~Lack of liquidity or a market for the units.
~Conflicts of interest may arise between you and the Managing General Partner, including which services they will provide to each Partnership, the amount the Partnership will pay for those services, how management time and services are allocated, and which leases will be assigned to each Partnership for drilling.

Item 9— Disciplinary Information

Disciplinary Information

This section of the brochure gives legal and disciplinary information of our owner and management team.

There are no legal or disciplinary events that are material to our relationship to you as your investment adviser. Neither the firm nor management staff has been involved in such actions.

Item 10—Other Financial Industry Activities and Affiliations

Other Financial Industry Activities and Affiliations

This section of the brochure describes other financial services affiliations that could present a conflict of interest with you

Richard G. Bryan is the sole owner of Bryan Advisory Services. He also is the owner of Bryan Energy Management, LLC, a sponsor and

general manager partner of oil and gas limited partnerships.

Neither Bryan Advisory Services nor any of its representatives receive any compensation, commissions or fees directly or indirectly from any investment advisors or advisory firms. Bryan Advisory Services does not maintain any relationships with advisors with any other advisory firms. Bryan Advisory Services does not have any other relationships with any other issuer of securities.

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

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

This section of the brochure describes our code of ethics adopted pursuant to SEC rule 204-1, and how we deal with client and related person trading.

Code of Ethics

We have adopted a code of ethics designed to prevent and detect violations of securities rules by our employees and affiliated persons. Our controls in this area focus upon securities transactions made by our employees that have access to material information about the trading of Bryan Advisory Services. We will provide a copy of our code of ethics to clients or prospective clients upon request.

Material Financial Interest and Personal Trading

From time-to-time the interests of the principal and employees of Bryan Advisory Services may coincide with yours and other clients. Individual securities may be bought, held, or sold by a principal or employee of BAS that is also recommended to or held by you or another client. If potential insider information is inadvertently provided or learned by a principal or employee, it is our policy to strictly prohibit its use.

It is the policy of BAS to permit the firm, its employees and investment advisor representatives (IARs) to buy, sell, and hold the same securities that the IARs also recommend to clients. It is acknowledged and understood that we perform investment services for different types of clients with varying investment goals, risk profiles, and time horizons. As such, the investment advice offered to you may differ from other clients and investments made by our IARs. We have no obligation to recommend for purchase or sale a security that BAS, its principal, affiliates, employees, or IARs may purchase, sell, or hold. When a decision is made to liquidate a security from all applicable accounts, priority will always be given to client orders before those of a related or associated person to BAS. In some cases the trades of the clients and advisory personnel will be combined in a single block trade, all trades will then receive the average price. We have procedures for dealing with insider trading, employee-related accounts, "front running" and other issues that may present a potential conflict when buy/sell recommendations are made. These procedures include reviewing employee security transactions and holdings to eliminate, to the extent possible, the adverse effects of potential conflicts of interest on clients.

Item 12— Brokerage Practices

Brokerage Practices

This section of the brochure describes how we recommend broker-dealers for client transactions.

Factors Considered When Recommending Broker-Dealers

You may choose your qualified custodian; however we may suggest or recommend that you use a specific qualified custodian and broker-dealer. When we make this recommendation, we consider and carefully review:

Competitive commissions and other costs of trading, ability to facilitate trades, access to client records, computer trading support, and other operational considerations.

These areas are reviewed regularly to assure us that the best interests of you and your account are serviced by the relationship with the broker-dealer.

Research and Other Associated Benefits

We recommend that clients establish brokerage accounts with quality firms (as "custodian"), registered broker-dealers, Member FINRA/SIPC or NYSE, to maintain custody of your assets and to execute trades for your account(s).

The custodian provides us with access to its institutional trading and operations services which are typically not available to retail investors. These services are offered to independent investment advisors at no charge in exchange for keeping a minimum amount of account assets at the custodian. The custodian's services include research, brokerage, and custody. The custodian offers access to mutual funds and other investments that are available only to institutional investors or require a significantly higher minimum investment. They also make other products and services available that benefit us but may not benefit our clients. Some of these other products and services help us manage and administer client accounts, and include software and other technology that:

provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (also allocation of aggregated trade orders for multiple client accounts), provide research, pricing information, and other market data, facilitate payment of our fees from your account(s), help with back-office support, record keeping, and client reporting. These services may be used with all or a substantial number of clients' accounts, including accounts not maintained at the custodian. We do not attempt to allocate the benefit to accounts proportionately to the accounts that generate the benefit.

Some of the products or services provided by the custodian do not qualify for the safe harbor in section 28(e) of the Securities Exchange Act of 1934, including those services that do not aid in investment decision-making or trade execution. These business management and development services, in addition to those listed above, may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the custodian may use third parties to offer these services to Bryan Advisory Services. The custodian may discount or waive fees it would otherwise charge for some of these business management and development services or pay all or part of the fees of a third party providing these services to us. Because we receive discounts, research, products, or services, we may have an incentive to select or recommend a broker-dealer based on our interest in receiving these benefits rather than on the client's interest in the most favorable execution. The chosen custodian may charge commissions (or markups/markdowns) higher than those charged by other broker-dealers in return for services and benefits.

Brokerage for Client Referrals

Bryan Advisory Services does not have any agreements to direct transactions to a particular broker-dealer in exchange for client referrals.

Directed Brokerage

If you direct Bryan Advisory Services to execute transactions at a broker-dealer other than one we have customarily used, you may pay higher execution costs due to the fact that we have not negotiated for volume discounts or batched orders.

Aggregated Orders

When we decide to purchase or sell a specific security for multiple clients at the same time, we may aggregate or combine the orders. This procedure will result in a single average price for all clients in the aggregated order. The custodian charges may result in savings versus not aggregating.

Item 13—Review of Accounts

Review of Accounts

This section of the brochure describes how often client accounts are reviewed and by whom.

Reviews

Richard Bryan, President of Bryan Advisory Services formally reviews all client accounts on an annual, semi-annual, or quarterly basis depending upon client preference. Reviews are coordinated with the Investment Advisory Representative of record in accordance with client request and/or regulatory supervisory procedures. Reviews are often used to rebalance according to a predetermined asset mix and to monitor performance. Trades to rebalance are made by client consent.

Reports

BAS prepares written reports after each review. The report includes portfolio accounting, performance, asset class, and investment company performance in absolute and relative measurements.

Clients also will receive reports, at least quarterly, directly from their qualified custodian which confirms the assets domiciled there and the activity/performance for the quarter. This serves as a third party check and balance for client disclosure and transparency.

Item 14— Client Referrals and Other Compensation

Client Referrals and Other Compensation

This section of the brochure discloses our arrangements with people who are compensated for referring us business. **Referral Relationships**

Bryan Advisory Services has not entered into any agreements with third parties to give or receive referrals for compensation.

Item 15—Custody

Custody

This section of the brochure encourages you to check the statements sent to you by your account custodian (broker-dealer) to ensure the accuracy of the fee calculation. Bryan Advisory Services is deemed to have limited custody if you have contracted with us to have fees deducted from your account.

You are encouraged to review account statements carefully and compare the amounts on the custodian statements with any statements we send to you and the fee schedule as per your Investment Advisory Agreement.

Item 16— Investment Discretion

Investment Discretion

This section of the brochure discloses the power we have to make trades in your account.

Except as otherwise set forth in the advisory contract, Client authorizes IA to investigate, purchase, and sell on behalf of Client, various securities and investment. IA is authorized to execute purchases and sales of securities on client's behalf without consulting Client regarding each sale or purchase. Any discretionary powers you grant us are set forth in your Advisory Contract. This power is not granted in non-discretionary accounts. Please read that contract section carefully before signing your contract.

Item 17— Voting Client Securities

Voting Client Securities

This section of the brochure explains our proxy voting policy and your ability to get proxy voting information from us. Bryan Advisory Services will not vote proxies for securities held in your investment account. Your account custodian or transfer agent will send proxy statements directly to you. If the investment account is for a pension or other employee benefit plan governed by ERISA, the right to vote such proxies is expressly reserved for you or your plan fiduciary, not BAS

Item 18— Financial Information

Financial Information

This section of the brochure is where investment advisors that collect more than $1200 in fees, six months or more in advance would include a balance sheet for you.

Prepayment of Fees

Bryan Advisory Services does not require prepayment of investment advisory fees greater than $1200 and does not require payment of fees more than six months in advance.

For your information, we are not aware of any financial condition that is reasonably likely to impair our ability meet our contractual commitments to you, including possible refunds that may be due you.

Privacy Statement

We, like other professionals who advise on personal financial matters, are required by federal law to inform you of policies regarding the privacy of your information.

In our advisory role, we may be privy to your personal financial information such as financial statements, account statements, and tax returns. All non-public personal information regarding you is held in strict confidence in accordance with our professional obligation and is not released to others without your consent. There may be times that you will be informed that we are required by legal process to release information that we have of yours. These are rare circumstances and you will be informed accordingly.

We may share your information with third parties who assist us in providing our services to you and they are subject to the same obligation not to disclose your personal information.

In order to guard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards to help us perform our responsibility to you. We must retain your records to assist you with your need for professional services from BAS and to meet our professional guidelines and obligations.

Item 19– Requirements for State-Registered Advisors

Richard G. Bryan, Jr., is the President of Bryan Advisory Services, LLC. and the following is his Educational Background and Business Experience:

Education: Bachelor of Science in Business Administration from Robert Morris College. He holds degrees in management and accounting.

Business Experience: Mr. Bryan has been the Supervisor and President of Bryan Advisory Services from 2010 to the present and he was the Principal Supervisor and President of Bryan Funding, Inc. from 1981 to 2019. Bryan Funding was a Brokerage Firm that managed clients' accounts in Stocks, Bonds, Mutual Funds and Tax Shelter Investments. Mr. Bryan held the following FINRA (Financial Industry Regulatory Authority) Licenses: Series 7 – Registered Representative, Series 24 Registered Principle, Series 27 – Financial & Operations Principle, Series 79 – Investment Banking. From 1983 to the present Mr. Bryan has been the Managing General Partner for 57 joint Ventures the 40 Limited Partnerships that were formed as Tax Advantaged programs that invested in Oil and Gas wells. The management of the Joint Ventures and Limited Partnerships is accomplished through Brymone Inc., Bryan & Bryan General Partners and Bryan Energy Management, LLC. To facilitate the management of these companies in 2004 he formed Discovery Oil & Gas, LLC which is a driller operator and in 2016 he formed Discovery Energy Resources which is a land leasing company. Mr. Bryan is the President of each of the above companies and they all are operated from 125 Technology Dr., Suite 105, Canonsburg, Pa 15317, Phone: 724.746.4004. He spends about 50% of his time on these other businesses. There are no other business activities of Mr. Bryan that might create a material conflict with your interests and his ability to put your interests first in his service to you and your portfolio management.

Mr. Bryan is not compensated for advisory services with performance-based fees. There are no legal or disciplinary events that are material to your association as a client of Richard G Bryan and Bryan Advisory Services. Richard G. Bryan, Jr. has not been involved in any events that require disclosure as materially relevant to your relationship in his role as your investment adviser.

Mr. Bryan is compensated for his employment with the above-listed companies in this section. He does not have any relationship or arrangement with any other issuer of securities.

Notes:

Exhibit I

Identification of Custodian	
The custodian for the account is:	Charles Schwab & Co., Inc.
Mailing Address:	P.O. Box 982603, El Paso, TX **79998**
Phone Number:	1 **(800)** 435-4000