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October 27, 2023

This Brochure provides information about the qualifications and business practices of FinSym Partners, LLC. If you have any questions about the contents of this Brochure, you may contact us at (206) 510-9234, or email bob@finsymllc.com to obtain answers and additional information. FinSym Partners, LLC is a registered investment advisor with the United States Securities and Exchange Commission ("SEC"). Registration of an investment adviser does not imply any level of skill or training. The information in this Brochure has not been approved or verified by the SEC, the State of Washington or any other state securities regulating body.

FinSym Partners, LLC

Additional information about FinSym Partners, LLC is available on the SEC's website at www.adviserinfo.sec.gov. The firm's IARD number is 153712.

Item 2 Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to Clients as required by SEC Rules. This Brochure dated October 27, 2023, is an update to our 2022 annual amendment prepared according to the SEC’s requirements and 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. We may further provide other ongoing disclosure information about material changes as necessary and will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

TD Ameritrade was acquired by Charles Schwab & Co., Inc. Consequently, beginning September 5, 2023, we transitioned from TD Ameritrade’s broker/dealer and custodian services to Charles Schwab for all our clients’ accounts (see Item 12 for further information).

Currently, our Brochure may be requested by contacting Brent Davidson at (206) 510-9234, or by email to bob@finsymllc.com.

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Item 4 Advisory Business

- A** FinSym Partners, LLC (“FinSym Partners” “we” “us” and “Advisors”) is an independent financial planning and investment management firm. We are a Washington Limited Liability Company and registered as an investment advisor with the Securities and Exchange Commission (“SEC”). Our principal place of business located in Seattle, Washington. FinSym Partners began conducting business as an independent investment advisory firm in 2010. Robert Davidson is the founder and President of FinSym Partners. On January 1, 2016, Brent Davidson became a partner of the firm. Robert and his brother, Brent Davidson each have 50% ownership interest in the firm.
- B** FinSym Partners offers Clients a comprehensive approach to wealth management and provides a variety of personalized financial and investment advisory services to our Clients. FinSym Partners is strictly a fee-only financial planning and investment management firm. The firm does not sell commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted. FinSym Partners can provide the following services to its Clients:
- Analysis of existing assets and investments
 - Understanding and assessment of client goals (education, savings, retirement age, etc.) and financial flexibility
 - Generation of a client balance sheet
 - Preparation of a detailed financial plan furnishing recommendations as to the allocation of present financial resources and investment strategies among different types of assets
 - Supply analysis and recommendations as to the actions and investment strategies necessary to attain Client financial planning objectives
 - Initial review of Client risk tolerance with periodic review
 - Development of Client specific Investment Policy
 - Recommended portfolio asset allocation and target investment vehicles
 - Monitoring and rebalancing of portfolio according to investment policy
 - Regular reporting and portfolio review vs. goals

In addition, we provide advice and referrals in other financial areas including estate planning, tax planning and preparation, and insurance.

INVESTMENT ADVICE:

Investment advice is an integral part of our services. Initially an analysis is done of a Client's existing assets and investment portfolio in conjunction with an assessment of their investing goals and objectives. Next, a customized portfolio in the form of an Investment Policy Statement (IPS) is created based on a Client's risk tolerance, return expectations, and time horizon. After agreement on the IPS, the portfolio is then implemented as soon as practical taking into consideration among other things tax implications of current investments.

Following implementation, the investment portfolio is monitored and rebalanced in accordance with the Client's objectives. Periodically, new investments and strategies suitable for use within the investment portfolio are evaluated.

Typically, an investment performance review is provided quarterly to each client. The review covers performance against financial plan goals, and performance of individual investments against their target benchmarks.

FinSym Partners does not act as a custodian of Client assets. The Client always maintains asset control. FinSym Partners places trades for Clients using a limited power of attorney.

Financial Planning:

FinSym Partners, LLC also provides an optional financial planning service for our Clients. The plan considers all of the Client's assets, liabilities, goals and objectives. The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

- C** Our advice and services are tailored to the stated objectives of each Client. FinSym Partners develops a written Investment Policy Statement (IPS) for each client. The IPS is informed by the client's financial plan and emotional tolerance for risk. It serves as the foundational roadmap for the investment portfolio. Developing and consistently adhering to an investment policy allows our clients to focus on the long-term goals of their financial plan, rather than become caught up in the short-term movements of the equity markets. All transactions in a Client's account are made in accordance with the directions and preferences provided to us by the Client.

In order to best serve their needs, we encourage our Clients to notify us of any life events or financial changes that could affect their individual financial circumstances and needs.

- D** We do not participate in or sponsor any wrap-fee programs.

- E** FinSym Partners manages a total of \$113,893,788 of Client assets of which \$109,577,192 is on a discretionary basis and \$4,316,596 on a non-discretionary basis. This amount was calculated as of January 11, 2023.

Item 5 – Fees and Compensation

- A** We are compensated for our services in accordance with “Schedule A” of the Investment Advisory Agreement (“IAA”), that each Client enters into at the beginning of our professional relationship. Fees may only be modified in agreement with Client and a new signed agreement or signed addendum to their current agreement. Such fees may be paid directly to FinSym Partners from the account by the independent custodian holding a Client’s account, upon submission of an invoice to the custodian showing the amount of fees, the value of the Client’s assets on which the fees are based, and the specific manner in which the fees are calculated. Payment of fees may result in the liquidation of a Client’s securities if there is insufficient cash in the account. Copies of the fee invoices will be mailed to Clients as required. Clients may be required to pay, in addition to our fee, a proportionate share of any mutual fund’s fees and charges.

Fees for each quarter are paid at the end of the quarter based on the total value of assets under management at the close of trading on the last business day of the quarter. The fee will be equal to the agreed upon rate per annum (set-forth in the IAA entered into each Client), times the market value of the account, divided by the number of days in the agreed upon year and multiplied by the number of days in the quarter. The market value will be construed to equal the sum of the values of all assets in the account, not adjusted by any margin debit. Fees for partial quarters at the commencement or termination will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter.

In all instances, the Adviser will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. Also, the Adviser will include the name of the custodian(s) on your fee invoice. The Adviser will send these to the client concurrent with the request for payment or payment of the Adviser’s advisory fees. We urge the client to compare this information with the fees listed in the account statement

STANDARD FEE SCHEDULE

1.00% on assets up to \$750,000
0.75% on assets between \$750,000 and \$1,500,000
0.50% on assets over \$1,500,001

The standard fee schedule is negotiable.

For defined benefit or retirement plan assets, which are not held by our recommended independent custodian, a fee of .50% will be assessed to that portion of a Client's portfolio held-away.

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported shall be valued at the last reported sale price on the principal market in which they are traded (or, if there shall be no sales on such date, then at the mean between the closing bid and asked prices on such date). Other readily marketable securities shall be priced using a pricing service or through quotations from one or more dealers. All other assets shall be valued at fair value by the Advisor whose determination shall be conclusive.

The fee for financial planning services is billed at a flat rate of \$1,500.00, due at time of service.

- B** As noted in the above section, our fees are deducted from Client's assets held with an independent custodian, and paid directly to FinSym Partners based on the agreement entered into at the start of the advisory relationship. The fee is deducted at the end of each quarter.
- C** Each Client's account custodian may charge fees, which are in addition to and separate from the investment advisory service fee we charge. All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. Clients bear responsibility for verifying the accuracy of fee calculations.

- D** Our policy is to avoid acceptance of fees in advance. Accordingly, fees for asset management service are billed at the end of each quarter. Fees for partial quarters at the commencement or termination of this Agreement will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter. Quarterly fee adjustments for additional assets received into the account during a quarter or for partial withdrawals will also be provided on the above pro rata basis.
- E** FinSym Partners is a fee-only advisor meaning we do not receive any compensation from the sale of securities or other investment products.

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

We do not charge any performance-based fees for our services. Accordingly, this item is not applicable to our firm.

Item 7 – Types of Clients

FinSym Partners provides investment advice and portfolio management to individuals, some percentage of who are high net worth individuals, as well as trusts, estates and charitable organizations.

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

A FinSym Partners provides investment guidance on a wide range of investment securities including (but not limited to) the following:

- Investment company securities such as mutual fund shares
- Equity securities such as:
 - Exchange-listed securities
 - Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- United States government securities
- Private company partnerships and investments
- Interests in partnerships investing in real-estate

Our core investing philosophy centers on extensive financial science and research and a belief in efficient capital markets. Based on this research, FinSym Partners employs investing strategies that adhere to the following principles:

- Risk and return are highly correlated; providing investors with investments that match their risk/return profile is a core tenet of FinSym Partners
- Asset allocation and diversification are key determinants of a portfolio's risk and return, and FinSym Partners provides Client with highly diversified portfolios and an asset allocation that is tailored to their specific objectives
- Structured investing (passive investing or indexing) is the preferred investing style versus active investing which is based on speculative stock picking and market timing
- Value and small capitalization stocks have historically outperformed growth and value stocks. Consequently, we tend to overweight portfolios in value and small cap stocks.

We primarily use fundamental analysis for research and review of securities including mutual funds. The main sources of information we rely on to provide advice include financial publications, research materials prepared by others, annual reports, prospectuses, filings with the Security and Exchange Commission,

and company press releases. We also subscribe to various professional publications deemed to be consistent and supportive of our investment philosophy.

FinSym Partners' primary investment strategy is centered on long-term purchases (securities held at least one year) but may include short-term purchases (securities sold within a year).

We focus on developing a customized investing strategy that targets an appropriate return commensurate with the associated level of risk. To achieve this, we build portfolios containing multiple assets classes (e.g., value funds, small-cap funds, international market funds, etc.). We focus on investments that do not rely on stock picking and market timing to achieve their returns. In doing so we seek to reduce risk and lower cost associated with actively managed portfolios.

- B** We will use our best judgment and good faith efforts in rendering services to Client. However, we cannot warrant or guarantee any particular level of account performance, or that account will be profitable over time. Not every investment decision or recommendation made by Advisor will be profitable. Clients assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, and economic, political and business risks. Because Clients assume all market risk involved in the investment of account assets, they must understand that investing in securities involves risk of loss that each Client should be prepared to bear.

Except as may otherwise be provided by The Advisers Act of 1940 or other applicable state or federal law, FinSym Partners is not liable to Clients for:

- Any loss that a Client may suffer by reason of any investment recommendation made with that degree of care, skill, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use;
- Any loss arising from our adherence to a Client's instructions; or
- Any act or failure to act by a custodian of a Client account(s).

Nothing in this Agreement shall relieve FinSym Partners from any responsibility or liability that may arise under state or federal statutes. It is the responsibility of each Client to provide us complete information and to notify us of any changes in financial circumstances or goals.

- C** We do not limit our recommendations to a particular security therefore this Item is not applicable to our firm.

Item 9 – Disciplinary Information

We are required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm, or the integrity of our management. We have no information to disclose applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

The principal business of FinSym Partners is that of a registered investment advisor. We do not participate in any other financial industry activities or affiliations.

Item 11 – Code of Ethics, Participation or Interest in *Client* Transaction & Personal Trading

- A** FinSym Partners has adopted a Code of Ethics, which outlines proper conduct related to all services provided to Clients. The Code covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. Current or prospective Clients may request a copy of the firm's Code of Ethics by contacting Robert Davidson at (206) 276-1774 or bob@finsymllc.com.
- B, C** FinSym Partners or individuals associated with our firm may buy and sell some of the same securities for their own account that we buy and sell for our Clients. In all instances, where appropriate FinSym Partners or individuals associated with our firm will purchase a security for all of our existing accounts for which the investment is appropriate before purchasing any of the securities for our own account and, likewise, when we determine that securities should be sold, where appropriate will cause these securities to be sold from all of its advisory accounts prior to permitting the selling of the securities from its accounts. In some cases we may buy or sell securities for its own account for reasons not related to the strategies adopted by our Clients.

When FinSym Partners is newly engaged by an investment advisory Client for whom we expect to recommend securities in which our firm or our principal holds a position, we will notify the new Client of any policies we have in place regarding officers trading for their own account.

We will disclose to Clients any material conflict of interest relating to our firm, our representatives, or any of our employees, which could reasonably be expected to impair the rendering of unbiased and objective advice.

- D** Occasionally, we may recommend, buy and/or sell securities for our personal accounts that we may also recommend for our Client portfolios. However, there is no conflict of interest or commingling of funds, as the securities are widely held

and publicly traded, and we are too small an advisor/investor to affect the market. In all cases, we place the Client's interest ahead of our own.

Item 12 – Brokerage Practices

A Although Clients may direct us to use a broker-dealer of their choosing, we generally recommend that clients open brokerage accounts with Charles Schwab & Co., Inc. In recommending broker-dealers, we seek to obtain “best execution,” meaning that we seek to execute securities transactions for clients so that the total costs or proceeds in each transaction are the most favorable under the circumstances. The factors we consider when evaluating for best execution include:

- Execution capability;
- Commission rate;
- Financial responsibility;
- Responsiveness;
- Custodian capabilities;
- The value of any research services/brokerage services provided; and
- Any other factors that we consider relevant.

However, if the Client selects the broker-dealer of their own choosing, we may be unable to seek best execution of your transactions, and your commission costs may be different than those of our recommended broker-dealers. In addition, we may place your transactions after we place transactions for clients using our recommended broker-dealers.

Recommending a broker-dealer can create a conflict of interest. Accordingly, FinSym Partners has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer, associated person, or employee of Advisor shall not buy or sell securities for his personal portfolio where his decision is substantially derived, in whole or in part, by reason of his employment unless the information is also available to the investing public or reasonable inquiry. No person of Advisor shall prefer his or her own interest to that of the advisory Client.

2. Advisor maintains a list of all securities holdings for itself and anyone associated with its advisory practice with access to advisory recommendations. An appropriate officer of the Advisor reviews these holdings on a regular basis.
 3. Advisor emphasizes the unrestricted right of the Client to decline to implement any advice rendered.
 4. Advisor emphasizes the unrestricted right of the Client to select and choose any broker or dealer, and/or insurance company he/she wishes.
 5. Advisor requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
 6. Any individual not in observance of the above may be subject to termination.
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1. As referenced above, and after thoroughly researching custodians, FinSym selected Charles Schwab & Co., Inc. to be the custodian of our client's assets. Charles Schwab & Co., Inc. is a member of the Securities Investor Protection Corporation (SIPC). Through a combination of protection provided by SIPC and Lloyds of London, Client assets are protected up to \$1 Million in cash and \$250 Million in securities. Coverage provides protection against Charles Schwab & Co., Inc. insolvency, not loss in value of securities. With Charles Schwab & Co., Inc. as a custodian, clients have direct and secure Internet access to their accounts.

B We are authorized in our discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and other transactions in the same or similar securities or instruments for other Clients. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the account will be deemed to have purchased or sold its proportionate share of the securities or instruments involved at the average price so obtained.

Please note that stock exchange regulations may in certain instances prevent the executing broker-dealer from delivering to the account a confirmation slip with respect to its participation in the aggregated transaction and, in such event, we will advise the Client in writing of any purchase or disposition of instruments for

the account with respect to any such aggregated transaction. We direct that confirmations of any transactions effected for a Client's to be sent, in conformity with applicable law, to the Client.

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Item 13 – Review of Accounts

- A** Accounts are reviewed by Robert Davidson or Brent Davidson or a qualified staff member supervised by Robert Davidson. The frequency of reviews is based on the Client's investment objectives, but generally occurs no less than annually. In addition, we periodically revisit each Client's goals and objectives to ensure that we are on track. This level of attention to each Client's account enables us to respond quickly if there is a change to a Client's financial position.

Financial planning Clients receive their financial plans and recommendations at the time service is completed. Depending on the type of financial planning service requested, we will meet on a regular basis with Clients to discuss any potential changes to their financial plan.

- B** Special reviews are conducted when material changes occur, such as a change in a Client's investment objectives, tax considerations, large deposits or withdrawals, large sales or purchases, loss of confidence in corporate management, or changes in the macro-economic climate.
- C** All investment advisory Clients receive quarterly reports on representative investments recommended specifically by FinSym Partners. Investment advisory clients also receive standard account statements from the custodian of their accounts on a monthly or quarterly basis. Financial planning clients do not normally receive investment reports.

Item 14 – *Client* Referrals and Other Compensation

FinSym Partners has no arrangements, written or oral, in which it compensates any individuals or entities for referrals of clients, nor are there arrangements by which other economic benefits (such as sales awards or incentives) are derived.

Item 15 – Custody

Other than having the ability to deduct our fees from client accounts, FinSym Partners does not have custody of the assets in the account and shall have no liability to Clients for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation (“SIPC”) or any other insurance which may be carried by the custodian. Clients understand that SIPC provides only limited protection for the loss of property held by a broker-dealer.

Item 16 – Investment Discretion

FinSym Partners accepts discretionary authority to manage securities accounts on behalf of clients. FinSym Partners has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, FinSym Partners consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

If a client chooses not to allow FinSym Partners discretionary authority, then FinSym Partners has non-discretionary authority to execute its investment recommendations in accordance with each Client's objectives and suitability parameters. Non-discretionary authority requires us to obtain a Client's approval of each specific transaction prior to executing investment recommendations. We must also obtain prior Client approval when selecting and retaining sub-advisors to the account.

Item 17 – Voting *Client* Securities

Unless specifically directed otherwise in writing by the Client, FinSym Partners is not authorized to receive and vote proxies on issues held in the account or receive annual reports.

Item 18 – Financial Information

- A** FinSym Partners does not require prepayment of fees of more than \$500 per client six months or more in advance, therefore disclosures required in this section to not apply to our firm.
- B** FinSym Partners has no financial commitment that would impair or impede its ability to meet contractual and fiduciary commitments to Clients.
- C** FinSym Partners, and nobody associated with our firm has ever been the subject of a bankruptcy petition.

Item 19 – Additional Information

A EDUCATION AND BUSINESS BACKGROUND

Robert P. Davidson

Managing Member

Born July 11, 1965

Educational Background

1993, Masters of Management, Northwestern University, Evanston, IL

1987, Bachelor of Arts in Economics, Whitman College, Walla Walla, WA

Successfully passed the Series 63 and Series 7 examinations.

Business Background

2010 – Present President/Registered Investment Advisor
FinSym Partners, LLC

1998 – 2009 Managing Director, Wells Fargo Securities

1997 – 1998 Vice-President, Dain Bosworth

1993 – 1997 Vice-President, A.G. Edwards & Sons

1987 – 1991 Senior Consultant, Anderson Consulting

Brent H. Davidson

Partner

Born January, 1968

Educational Background

1990, Bachelor of Arts in Business and Accounting, University Washington, Seattle, WA

Certified Public Accountant

Successfully passed the Series 65

Business Background

2016 – Present	Registered Investment Advisor FinSym Partners, LLC
2009 – 2015	Vice President Information Technology, Holland America
2006 – 2009	Director IT Strategic Planning, Holland America
1996 - 2006	Various Financial Positions, Holland America
1994 – 1996	Senior Budget Analyst, Frigoscandia
1990 – 1994	Senior Auditor, Arthur Andersen

B OTHER BUSINESS OPERATIONS

Neither Robert Davidson or Brent Davidson is involved in any other business operations.

C PERFORMANCE BASED FEE CALCULATIONS

FinSym Partners does not receive performance-based fees.

D.1 AWARD OR LIABILITY IN AN ARBITRATION CLAIM EXCEEDING \$2,500

Neither Robert Davidson, Brent Davidson, nor anybody associated with FinSym Partners, has ever been the subject of any claims involving any investment or investment-related business activity or, any dishonest, unfair or unethical practices.

D.2 AWARD OR LIABILITY IN A CIVIL, SELF-REGULATORY ORGANIZATION OR ADMINISTRATIVE PROCEEDING

Neither Robert Davidson, Brent Davidson, nor anybody associated with FinSym Partners, have ever been subject to liability in a civil, self-regulatory organization

or administrative proceeding involving any investment or investment-related business or activity, unfair or unethical practices.

**E RELATIONSHIPS OR ARRANGEMENTS WITH ISSUER(S) OF SECURITIES NOT DISCLOSED IN
ITEM 10.C**

FinSym Partners does not have a relationship or arrangements with any issuer of securities, therefore we have no information to disclose applicable to this Item.

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