

BradfordCrane Company, LLC

(CRD 132288)

P.O. Box 4872
South Colby, WA 98384
www.PeaceOfMindWaypoints.com

Form ADV Part 2A
Client Brochure

November 9, 2026

This brochure provides information about the qualifications and business practices of BradfordCrane Company LLC. If you have any questions about the contents of this brochure, please contact us at 805-407-1694 or contact@peaceofmindwaypoints.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 BradfordCrane Company is available on the SEC's website at www.adviserinfo.sec.gov. Registration as a "registered investment adviser" does not imply a certain level of skill or training.

Form ADV Part 2 Client Brochure for
BradfordCrane Company, LLC

Item 2 Material Changes

N/A

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of BradfordCrane Company.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at http://www.adviserinfo.sec.gov by searching for our firm name or by our CRD number 132288.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at 805-407-1694.

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Item 4 Advisory Business

Description of BradfordCrane Company

Terry Bradford-Crane established BradfordCrane Company in August 2004 and in 2005, BradfordCrane Company became registered as an investment advisor. Ms. Bradford-Crane is the sole managing member of BradfordCrane Company and the company currently reports no discretionary or non-discretionary Assets Under Management.

BradfordCrane Company provides financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning is a comprehensive evaluation of a client's current and future financial state; the process uses currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis are considered for the purpose of determining how they affect the financial and personal well-being of the client. Clients purchasing this service will receive a written report, which serves as a holistic financial "game-plan", designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- Cash and Debt Management: Provide client assistance in development of personal statements of cash flows, balance sheets, and income statements. The financial statements provide an organized way to evaluate assets, liabilities, and degree of financial freedom and flexibility to attain financial goals and objectives. Topics for discussion include (but are not limited to) total household income, total household expenses, timing of debt obligations, budgets, emergency fund development, and discussions about the importance of managing cash, assets, and debt as tools to reach for the client's vision of financial independence.
- Education Planning: Develop financial action plans to create meaningful, actionable steps toward educational goals. Education Planning at BradfordCrane Company includes, not only determining the amount of assets that may be required to attend a specific learning institution, but also assistance in providing the necessary information to determine if a particular institution provides the curriculum, services, and environment desired. Savings, scholarships, tax credits, transfer of assets, work programs, tuition plans and education savings plans are integrated into a comprehensive course of action for the client's consideration.

- Retirement Planning: The process of determining the income necessary for the client to live a desired lifestyle during retirement years. No two clients are the same, with respect to their goals, dreams and how they will go about fulfilling their quest for financial independence. This process requires in-depth discussion and evaluation of assets, debts, current income, time until retirement, personal retirement savings, expectations of future incoming assets or expenses, estimation of expenses in retirement, life expectancy, the time value of money, and specific measures to implement a reasonable savings discipline to reach retirement lifestyle goals.
- Risk Management: Is all about managing and mitigating the potential effects of a "loss." Examples of central questions throughout the development of risk management action plans are: "If I lose the use or benefit of "Item A", how will it affect my plans for the future?" or "How will my quality of life, or the lives of my loved ones be affected by the loss of "Item A." Risk management is about attempting to control the threats to our short-, medium-, and long-term financial goals. Some of these threats include stock market declines, the loss of income, the loss of a home due to fire or flood, the untimely death of a primary household income provider, a disability, and the need for care and assistance with daily activities of living as we age. After a thorough evaluation of the financial health of the client, BradfordCrane Company will work cooperatively with the client to identify areas that could benefit from the protection insurance provides.
- Additional special planning needs specifically requested by clients on a case-by-case basis. For many of the topics listed above it is likely that the client will require the assistance of a Tax, Estate or Long-Term Care Planning professional. Where BradfordCrane Company recognizes the need for such a professional, or additional expert analysis beyond the capabilities of this company, it will promptly advise the client to seek the appropriate financial specialist(s). BradfordCrane Company welcomes the opportunity to work with client's well established, trusted advisors to aid the client in implementing or modifying steps toward the client’s personal vision of financial freedom, flexibility, and independence.

Comprehensive Financial Planning

This service involves working one-on-one with a financial planner for one year. Clients are guided through discovering and establishing their goals and values around money. Clients are required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning. This list is not all-inclusive, and the financial planner will notify client of required information

or need for updated documents or data on a case-by-case basis. Once the client's information is reviewed, the financial planner and client will discuss findings, analysis, and proposed potential changes to their current investment choices, documents, or processes. Clients receive a written Financial Plan Commentary, planning software report (if applicable), glossary of terms, and a presentation designed to provide the client with a review of financial planning process findings and recommendations. Two complimentary 1-hour follow-up meetings are scheduled to answer any client questions and review client progress on completion of any recommended action steps. Complimentary follow-up meetings must be completed during the one-year term of the engagement.

After one year or two 1-hour follow up meetings, whichever comes first, financial planning services are provided at the current hourly rate.

One-time Limited Engagement Consultation/Advisory Service

Limited Engagement Advisory Services are offered as one-time reviews and consultations. This service involves working one-on-one with a financial planner to provide financial planning advice on two or fewer of several financial planning areas. Action plans are narrow in topic focus. The client establishes financial goals and communicates values and thoughts about money. Clients are required to provide information to help complete analysis of two or fewer financial planning topics for the purpose of providing guidance in a limited financial planning area of concern. Once the client's information is reviewed, the financial planner and client will discuss findings, analysis, and proposed potential changes to their current investment choices, documents, or processes. Clients purchasing this service will receive a written or an electronic report, providing the client with detailed "action plans" to achieve his or her stated financial goals and objectives. Client financial situation, goals, objectives, and investments are not monitored. Clients are required to provide information to help complete the following areas of analysis, as required by their needs, goals, and objectives: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning. Once Client information is reviewed, the report is built and analyzed, and then the findings, analysis, and proposed changes will be reviewed with the client. Clients receive the written report and virtual or in-person presentation on client specified areas of concern, designed to achieve his or her stated financial goals and objectives.

Limited Engagement Advisory Services are offered at the current hourly rate.

Educational Seminars and Speaking Engagements

BradfordCrane Company may provide seminars on an "as announced" basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of investment products. Information presented will not be based on any individual person's need, nor does BradfordCrane Company provide individualized investment advice to attendees during these seminars.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all our clients. However, *specific client financial plans* and their implementation are dependent upon the client Investment Policy Statement (or similar data gathering documents) which cover each client's current financial wellness, financial literacy, income, tax brackets and risk tolerance levels. The data gathered is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

BradfordCrane Company's goal is to provide superior client service by offering:

- Comprehensive Financial "life" planning tailored to the individual needs of each client and financial literacy resources to build a client-planner teamwork approach to achieving the clients' stated goals and objectives.
- Regularly scheduled reviews of net worth, cash flow, and account statements.
- Personalized, flexible action plans to implement agreed upon recommendations.
- Referrals to a select group of highly regarded professionals within the financial services industry, as required.
- Assistance with implementation of personalized action plans.
- Regularly scheduled client seminars on financial current events and topics of interest.
- Special guest events designed to educate and empower clients so that they are equipped to implement their action plans for their individual life planning goals.

BradfordCrane Company does not execute trades. Clients pay a fee for regularly scheduled consultations and are responsible for executing advice if they choose to accept it.

Advisory Services

Approximately 25% of BradfordCrane Company advisory services consist of seminars and guest speaking events on investment related current events and topics of interest. The remaining 75% of BradfordCrane Company business consists of comprehensive financial planning, giving investment advice through consultations, and occasional advice on matters not specifically involving securities. The client base consists of corporate benefit administrators, individuals, small business owners, investment clubs, and networking organizations.

As a part of comprehensive financial planning or limited planning engagements, services include review of investment accounts and subsequent recommendations on asset allocation and diversification. BradfordCrane Company offers advice on equity securities, corporate debt, commercial paper, certificates of deposit, municipal securities, mutual funds, and US government securities. Recommendations will be based upon individual risk tolerance of clients. Throughout the financial research and planning partnership BradfordCrane Company's goal is to assist the client in defining successful outcomes or goals that are flexible enough to be modified as “life changes” (unexpected and planned) occur throughout their personal financial empowerment journey. Clients will participate in confidential information gathering sessions to discuss their perspectives on and experiences with saving, investing, and past efforts to reach financial goals. Clients are urgently encouraged to provide complete and accurate information regarding all aspects of their personal and financial situation including objectives, needs and values, investment statements, tax returns, copies of wills, powers of attorney, insurance policies, employment benefits, retirement benefits, and relevant legal agreements. This list is not all inclusive and any other relevant information should be disclosed in a timely manner. This information is evaluated to determine the client's risk tolerance and level of understanding of financial concepts pertaining to proposed action plans. Clients are encouraged to immediately express their concerns with any aspects of the advisory process or place restrictions on the types of securities to be considered in the planning and investment vehicle recommendation process.

BradfordCrane Company does not maintain assets under management, nor does it offer wrap fee programs. Client assets are maintained at a brokerage firm of the client's

choosing. In addition, BradfordCrane Company does not manage client assets on a discretionary basis. BradfordCrane company aims to create synergy and ensure quality planning and investor education partnerships with its clients. To that end, it is the client's responsibility to provide complete and accurate information regarding all material aspects of their personal and financial situation, regarding objectives, needs and values, and relevant financial and legal documents.

A BradfordCrane investment adviser contract ***does not grant discretionary power to the adviser or any representative of the BradfordCrane Company***. In addition, contracts will not be assigned by the investment adviser without the consent of the client.

CCR Section 260.235.2 Disclosure (California)

For clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our client. The client is under no obligation to act on our recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through our firm.

Item 5 Fees and Compensation

Advisory Fees

Please note: Unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How BradfordCrane Company is paid depends on the type of advisory/planning service we are performing. Please review the fee and compensation information below.

Limited Engagement Advisory and Financial Planning Services

A ***$500 fee is due at time the advisory contract is signed to commence limited engagement, one-time advisory services.*** *This non-refundable administrative fee covers, but may not be limited to, BradfordCrane Company costs incurred for client onboarding, initial data gathering, establishing access to financial planning software and*

business services, and setting the basis for the financial planning engagement. This work will commence immediately after the fee is paid. The upfront portion of the fee will not be paid more than 6 months in advance.

Limited Engagement Advisory and Financial Planning services are provided at an hourly rate of $300 per hour and billed monthly. Any balance due for limited planning engagements must be paid within 30 calendar days of client receipt of invoice (Net 30 Payment Terms), or per the negotiated advisory contract and engagement letter, if applicable. Failure of payment to arrive by invoice due date is cause for termination of agreement by BradfordCrane Company. Electronic invoices for services include a description of services offered, fee(s) due for services, the formula (or appropriate reference to the brochure or contract) used to calculate the fee(s), and the time-period covered by the fee(s).

Limited Engagement fees are negotiable, fully disclosed, and payable in accordance with the letter of engagement. Fees are not deducted from accounts. Fees may be paid with a credit or debit card, or ACH via the BradfordCrane Company AdvicePay portal.

Comprehensive Financial Planning

A ***$500 fee is due at time the advisory contract is signed to commence financial planning services.*** *This non-refundable administrative fee covers, but may not be limited to, BradfordCrane Company costs incurred for client onboarding, initial data gathering, establishing access to financial planning software and business services, and setting the basis for the financial planning engagement. This work will commence immediately after the fee is paid. The upfront portion of the fee will not be paid more than 6 months in advance.*

Comprehensive Financial Planning services are provided at an hourly rate of $300 per hour and billed monthly. Any balance due for planning engagements must be paid within 30 calendar days of client receipt of invoice (Net 30 Payment Terms), or per the negotiated advisory contract and engagement letter, if applicable. Failure of payment to arrive by invoice due date is cause for termination of agreement by BradfordCrane Company. Electronic invoices for services include a description of services offered, fee(s) due for services, the formula (or appropriate reference to the brochure or contract) used to calculate the fee(s), and the time-period covered by the fee(s).

Comprehensive Financial Planning fees are negotiable, fully disclosed, and payable in accordance with the letter of engagement. Fees are not deducted from accounts. Fees

may be paid with a credit or debit card, or ACH via the BradfordCrane Company AdvicePay portal.

Termination of Contracts

Comprehensive Financial Planning and Limited engagements may be terminated by either party at any time for any reason. Notice of either BradfordCrane Company's or the client's desire to terminate a contract or financial planning engagement must be given in writing. In the case of multiple clients for an individual contract or engagement (i.e., JTWROS), each client must sign the letter to terminate the investment advisory contract or letter of engagement. Termination by either the client or BradfordCrane Company must be in writing and shall be effective on the day BradfordCrane Company receives the correspondence to terminate the contract. The effective date of the termination of a contract shall be at 11:59 pm EST (EDT) on the day BradfordCrane Company is notified of the client's desire to terminate the contract. Any unearned fees shall be refunded in accordance with the refund policy noted in the investment advisor contract and letter of engagement.

Contract Termination for Comprehensive Financial Planning - The client may cancel the contract, without penalty, within five (5) business days of entering into a signed agreement. ***In the event of contract termination prior to plan presentation or delivery, the client will be entitled to financial planning work completed and paid for; access to financial planning software will be terminated.*** *All original copies of client financial documents will be returned to the client.* The effective date of the termination of a comprehensive financial planning engagement contract shall be at 11:59 pm EST (EDT) on the day BradfordCrane Company is notified of the client's desire to terminate the contract.

The terms and services offered for comprehensive financial planning service are limited to the items described in the engagement letter.

Contract Termination for Limited Engagements - A client may cancel the contract, without penalty, within five (5) business days of entering into a signed agreement. ***In the event of early contract termination for one-time services, the client will be entitled financial advice work completed and paid for; access to financial planning software will be terminated.*** *All original copies of client financial documents will be returned to the client.* The effective date of the termination of a one-time limited engagement contract shall be at 11:59 pm EST (EDT) on the day BradfordCrane Company is notified of the client's desire to terminate the contract.

The terms and services offered for limited engagements are limited to the items described in the engagement letter.

Comprehensive financial planning and Limited Engagement service fees are not deducted from accounts. Fees may be paid with a credit or debit card, or ACH via the BradfordCrane Company AdvicePay portal. Cash is not accepted.

Educational Seminars, Webinars, Speaking Engagements, Fees, and Contract Termination

Terry Bradford-Crane is a public speaker. Seminars and webinars are offered to organizations and the public on a variety of financial topics. Generally, fees range from free (pro bono) to $15,000 per seminar, or free (pro bono) to $150 per participant. Generally, travel expenses are included in public speaking engagement fees, depending on sponsor, date, location, and program requested. *The range provided is an estimate and negotiated fees may be more than $15,000 based upon specific services provided and details in letter of engagement or investment advisor contract.

- The fee range is based on the content, amount of research conducted, number of hours of preparation needed, and the number of attendees. Preparation of deliverables is charged at the negotiated hourly rate.
- 10% of the estimated fee is for administrative and client onboarding services and is due upon commencement of engagement unless alternative arrangements are made with BradfordCrane Company per a signed contract. This portion of the speaking/webinar engagement fee covers, but may not be limited to, BradfordCrane Company costs incurred for client onboarding, client specific data gathering, and initial financial planning research and preparation required to deliver a quality presentation. This work will commence immediately after the fee is paid and is non-refundable. The upfront portion of the fee will not be paid more than 6 months in advance.
- 50% of estimated fee must be paid within 30 calendar days of client receipt of invoice (Net 30 Payment Terms), but no later than 30 days prior to presentation date.
- Remaining 50% of estimated fee must be paid within 30 calendar days of client receipt of invoice (Net 30 Payment Terms).
- Any unearned fees shall be refunded in accordance with the refund policy noted in the investment advisor contract and letter of engagement.

- Alternative payment terms may be negotiated per a signed advisory contract and engagement letter, if applicable.

In the event of material technological disruptions, inclement weather, or a flight/transportation cancellation, the Speaker shall make all reasonable attempts to make alternative travel or appropriate virtual meeting arrangements to arrive in time for or to deliver the presentation. If travel proves impossible, or the event is otherwise cancelled, the Speaker's fee minus the administrative and onboarding fee will be refunded. The administrative and onboarding fee shall be applied to a future presentation date per a revised letter of engagement. *Client has 90 days from date of cancellation to apply administrative and onboarding fee to a revised engagement. Revised seminar, webinar, or speaking engagement must be complete within 120 days of cancellation of original presentation date.*

In the event the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred. The administrative and onboarding fee shall be applied to a future presentation date per a revised letter of engagement. *Client has 90 days from date of cancellation to apply administrative and onboarding fee to a revised engagement. Revised seminar, webinar, or speaking engagement must be complete within 120 days of cancellation of original presentation date.*

In the event the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. Client will not be responsible for any travel costs already incurred by the Speaker. The administrative and onboarding fee shall be applied to a future presentation date per a revised letter of engagement. *Client has 90 days from date of cancellation to apply administrative and onboarding fee to a revised engagement. Revised seminar, webinar, or speaking engagement must be complete within 120 days of cancellation of original presentation date.*

Educational Seminars and Speaking Engagements may be provided pro-bono at BradfordCrane Company's discretion.

All fees quoted are subject to change unless a signed contract has been executed and a deposit has been received by BradfordCrane Company.

Fees Paid in Advance

BradfordCrane policy with respect to payment and reimbursement of fees is covered in Item 5 (Advisory Fees, pg. 9).

Compensation for Sale of Securities

Neither BradfordCrane Company nor any supervised person working on behalf of BradfordCrane Company accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sales of mutual funds. Compensation arrangements with securities or investment product firms that allow for compensation of investment advisors based upon selling securities presents great potential for a conflict of interest. These compensation arrangements give any investment advisor (individual or company) or supervised person incentive to recommend investment products based upon the compensation received, rather than *client needs.* Clients compensate BradfordCrane Company based upon a client partnership that facilitates: 1) review and prioritization of goals and objectives; 2) development of summaries of current financial situations; and development of planning strategies and recommendations based upon client needs, wants, and risk tolerances. To that end, which places the highest priority on honoring its fiduciary responsibilities, BradfordCrane Company does not accept compensation or "referral fees" from professionals to whom a client may be referred. If a conflict of interest with reference to compensation does arise, our clients will be notified at the time the conflict arises during the planning and recommendation process and in writing.

BradfordCrane Company is not affiliated with any other brokers or agents within the financial services industry. Clients must purchase investment products recommended through brokers or agents of their own choosing.

When implementing an investment recommendation, the client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal

management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

Item 6 Performance Based Fees and Side by Side Management

Performance based fees are based on a share of capital gains on or capital appreciation of the assets of a client (such as a client that is a hedge fund or other pooled investment vehicle). BradfordCrane Company and any potential supervised persons do not accept performance-based fees or manage accounts that are charged a performance-based fee in addition to being charged another account fee.

Item 7 Types of Clients

BradfordCrane Company advisory services primarily consist of: 1) comprehensive financial planning; 2) offering investment advisory services through consultations; 3) seminars and guest speaking events on investment related current events and topics of interest; and 4) advice on matters not specifically involving securities to include mentoring and motivational speaking topics that encourage audiences to strive for their own personal version of financial independence. The client base consists of corporate benefit administrators, individuals, small business owners, non-profit organizations, investment clubs, and networking organizations. BradfordCrane Company is committed to encouraging individuals increase their financial knowledge, employ financial wisdom, and reach for their financial goals. There is no financial asset minimum requirement for review, consultations, or establishing a comprehensive financial planning client engagement.

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

As a part of comprehensive financial planning, BradfordCrane Company offers advice on equity securities, corporate debt, commercial paper, certificates of deposit, municipal securities, mutual funds, and US government securities. A combination of fundamental, technical, and cyclical analyses is used to evaluate individual securities. The concepts of the Efficient Market Hypothesis (the theory that it is extremely difficult, if not impossible, to "beat the market" because all relevant information about the investment is available and incorporated into the price of the stock on a relatively real time basis) and Modern Portfolio Theory (a theory that addresses individual portfolio risk and expected returns of individual securities) are considered vital in the formulation of client recommendations. As a result, BradfordCrane Company is not an advocate of day trading, but rather investing with the appropriate instrument for the given timeline in a cost-efficient manner.

Analysis Type	Explanation	Risks
Technical Analysis	Searching for and evaluating apparent patterns in *historical* values of individual security investments and markets, and how they *historically* responded to changes various economic environments. Patterns may give an indication of price movement extent, direction, and duration in a given market.	Information is readily accessible and the direction, degree and duration of future price movements cannot be determined by using historical data exclusively. While historical patterns may be a helpful component of security analysis, research strongly suggests that historical data and performance of a security in various markets is inherently priced into the security. In addition, there is a propensity to see relevant "patterns" that prove to be random.
Cyclical Analysis	Analysis of changes in prices and economic trends as the seasons change throughout the year. Special attention is given to company valuations and financial health and economic indicators at various points within the business cycle. Macroeconomic conditions, historically, follow an observable pattern that may give an indication of industry performance at points	In general, success with this strategy depends upon *timing* the market...*timing* the purchase or sale of securities with the business cycle. Unfortunate timing of a cyclical security (valuation is highly correlated to the strength of the economy) during a prolonged recession may lead to reduced portfolio valuations for extended periods of time. Use of cyclical securities exclusively may result in larger than average swings in portfolio values when economic news is released. Many statistical

	within the expansion/contraction cycle of the economy.	data points and economic indicators signify a change in the overall economy as the change is happening or after the change has already taken place. This analysis is technical in nature and dependent upon the forward pattern of the economy, and the exact timing of future contractions and expansions cannot be predicted. This uncertainty affects investor timelines and security holding periods.
Fundamental Analysis	Emphasis is placed on determining the *intrinsic value* of individual private or public companies or government entities that issue securities. Estimated *future* earnings, *future* dividends, interest rates and prospects for *future* growth, the timing of incoming cash flows and financial health give an indication of what the issued security is worth today. In general, emphasis is on finding companies or issuers that are better than the rest of the market perceives (underpriced) or not as great as the market perceives (overpriced) and buy or sell accordingly. Furthermore, this type of analysis is appropriate for long-term investing in quality companies.	All of the data points for fundamental analysis are readily available to the public. Typically, the current market price company share or yield of a debt instrument has all of the publicly available data and analysis of potential for growth (or failure) priced into the security. For investors that are timing the market for short term gains, it will prove difficult to net profits. Aside from the wide availability of financial data, the nature of company culture, and the specific risks associated with individual companies, fundamental analysis is dependent upon the accuracy of the data available and reported to the public. It is probable that unforeseen restatements of material financial data, changes in product demand, or a rotation in executive leadership will influence the calculated present value of a security. This translates to swings in portfolio values.

Various sources of information are used to gain overall perspective on the appropriate, personalized recommendations for asset allocation and portfolio diversification. Some of these sources include industry publications and research materials prepared by financial industry experts, corporate rating services, foreign and domestic business publications and news sources, and SEC filings and annual reports; this list is not all inclusive.

It is the goal of BradfordCrane Company to assist clients in developing roadmaps that lead toward their financial independence, as defined by their short-, medium-, and long-

term life planning goals. Clients are encouraged and empowered to define what they see as successful outcomes along their individual financial planning journeys. The Company's assessments and /analyses are intended to: compare client resources with stated financial goals; outline the steps that should be taken to permit the client to meet their stated goals; and encourage use of client financial resources efficiently.

The estimates, projections, and illustrations discussed during portfolio review sessions are only approximations based upon mathematical computations. ***Computations should not be considered an absolute representation of the actual future performance of any investment, asset, group of assets, or tax planning technique.*** Rather, these projections represent BradfordCrane Company's best efforts, in conjunction with the client's legal and tax advisors, to provide the client with general guidelines customized to their own specific financial situation.

Recommendations are be based upon individual risk tolerance of clients. ***Investing involves risk: the idea that you may not reach your rate of return goals in accordance with a given timeline, or that you may even lose capital.*** A client's ability to tolerate loss of capital (mentally and monetarily) is evaluated using in-depth and on-going discussion about objectives, time to reach objectives, priority of objectives, and general thoughts about individual, family, and business spending and saving practices. ***Investing involves risk that clients should be prepared to bear***. Because BradfordCrane Company is also committed to educating clients, the company will help the client discover and respect their tolerance for risk, and how it might evolve as they become more educated and confident in their investing experience. For the novice investor and the expert, BradfordCrane Company will serve as an objective evaluator of the client's risk tolerance and what that means for individual investment returns in the prevailing market, as well as what it ***may*** have meant historically.

Material Risks Involved

BradfordCrane Company does not provide investment management services; however, investment recommendations may be made as part of the financial planning service. **All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

- Market Risk: Market risk involves the possibility that an investment’s current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer’s operations or its financial condition.

- Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

- Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

- Turnover Risk**:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

- Limited markets**:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions broker-dealers may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

- Concentration Risk**:** Certain investment strategies focus on particular asset-classes, industries, sectors, or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

- Interest Rate Risk**:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

- Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

- Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

- *Commercial Paper* is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

- *Common stocks* may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

- *Corporate Bonds* are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

- *Bank Obligations* including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

- *Municipal Bonds* are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

- *Options and other derivatives* carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is

limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

- *Exchange Traded Funds* prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

- *Investment Companies Risk*. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

BradfordCrane Company is not permitted to furnish either legal or tax advice. The Company emphasizes the importance of having other advisors. Any calculations presented to clients are directly or indirectly based upon generally accepted tax principles, which are always subject to change. Thus, independent tax and legal counsel is required.

BradfordCrane Company does not execute trades. Clients pay a fee for regularly scheduled consultations and are responsible for executing advice in a timely manner, if they choose to accept it.

Item 9 Disciplinary Information

All registered investment advisors are required to disclose information about the disciplinary histories of advisor and the advisor affiliates. Bradford Crane Company has no material criminal, civil, regulatory disciplinary actions to report, whether foreign or domestic.

Item 10 Other Financial Industry Activities and Affiliations.

BradfordCrane Company is a limited liability corporation and is not affiliated with any other business in the financial services industry. There are no applications pending to register as a broker dealer or a registered representative, futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. BradfordCrane Company has no business relationships with other investment advisors that create a material conflict of interest for its clients. Terry Bradford-Crane is a principal and the financial manager for Allied Approach Group, LLC, an aviation test and evaluation consulting firm.

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

As a fiduciary, BradfordCrane Company and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

BradfordCrane Company Code of Ethics

BradfordCrane Company:

1. *Is committed to providing advisory and comprehensive financial planning services with the utmost candor, honesty, and compassion.*
2. *Will maintain objective perspective as a trusted advisor in the client's quest for financial empowerment by providing opportunities for client education in advisory process and pursuing client financial goals and objectives.*
3. *Will endeavor to engage clients in a manner that places the utmost importance on understanding their personal financial goals and subsequently, competently implementing communication, research, and planning skill sets to develop a roadmap to reach stated goals. If I do not have a specific skill set to provide a particular advisory need with integrity and objectivity, I will endeavor to find an appropriate resource for the client.*

4. *Aims to develop professional advisory relationships that emphasize fairness in treatment, communication, compensation, and disclosure of conflicts of interest.*
5. *Will not sell your personal information to anyone. Client non-public information will remain confidential and will not be released unless Bradford-Crane Company is given permission to release the information, or as permitted or required by law.*
6. *Is dedicated to devoting volunteer time in the community in the interest of educating and mentoring our youth, protecting our natural environments, and providing pro-bono services for underserved communities.*
7. *Will Provide professional financial advisory services and serve the community with dignity, courtesy and diligence in a manner that promotes dignity, courtesy, and diligence in others.*

A copy of the BradfordCrane Company Code of Ethics is available upon request for a client or prospective client upon request.

It can be expected that the owner of BradfordCrane Company, Terry Bradford-Crane, from time to time, will invest in the same securities (or related securities, e.g., warrants, options, or futures) as she recommends to clients. As an investment advisor, she manages her own investments. As the owner of BradfordCrane Company, an investment advisor, Terry Bradford-Crane has a legal responsibility to advise her clients in accordance with the fiduciary requirements set forth in the Investment Advisors Act of 1940 and the Securities Act of Washington (RCW 21.20). As a fiduciary offering advisory services, BradfordCrane Company and its owner must place client interests above her own, provide appropriate investment advice based upon accurate and complete client financial information, and proactively avoid conflicts of interests within the advisory relationship. BradfordCrane Company will disclose, in writing, any potential conflicts of interest or instances when personal accounts contain the same investments as a client account, or if BradfordCrane Company recommends an investment that is owned by Company or personal accounts. Disclosure of any known conflicts with reference to security ownership shall take place, in writing, at the time the security is recommended. As with all recommendations, Ms. Bradford-Crane will disclose any known conflicts of interest, discuss the merits and risks of recommended investments, and provide the rationale behind choosing the securities in question. The discussion will include why the securities in question are appropriate recommendations based upon the individual risk tolerance, needs, wants, and requirements of the client.

As of the date of this brochure, BradfordCrane Company does not have a material financial interest in any securities recommendations made to clients.

Item 12 Brokerage Practices

Not Applicable. BradfordCrane Company does not execute trades. Clients pay a fee for regularly scheduled consultations and are responsible for executing advice, in a timely manner, if they choose to accept it. The Company does not, as a practice, refer clients to *specific* broker-dealers, however, clients are encouraged to be engaged and informed consumers when considering costs involved with trade execution, as it pertains to portfolio performance. BradfordCrane Company does not receive any "soft dollar benefits from any broker-dealer or any third party in connection with client securities transactions. BradfordCrane Company does not receive client referrals from a broker-dealer or a third party.

Item 13 Review of Accounts

Clients shall provide a copy of all account statements to be reviewed by BradfordCrane Company as the statements become available or as requested by the financial planner. Investments and overall progress of goal attainment is reviewed in accordance with a signed investment advisor contract and letter of engagement on a quarterly basis for individuals with an ongoing engagement contract on file with BradfordCrane Company. In the event of an on-going, comprehensive financial planning engagement, clients participate in a thorough review of stated goals and plans and their finances at a minimum of once per year. It is preferable that the annual client meeting is in person. A written review of topics, concerns, and any material information pertaining to client financial health or account statements available for review will be provided upon completion of any client meetings. The client must provide complete and accurate information regarding all aspects of their personal and financial situation that will have a material effect on account review and advisory recommendations. If the client experiences a life event that could reasonably be expected to prompt reconsideration of investment timelines, rate of return goals, risk tolerance, needs and values, goals and objectives, or any other aspect of advisory topics discussed with BradfordCrane Company, the client must notify BradfordCrane Company; accounts and advisory "action plans" will be reviewed and advice offered, as appropriate by BradfordCrane Company. Comprehensive financial planning includes a review of the types of changes in the financial services industry or investment market that would compel BradfordCrane Company to pro-actively contact the client to discuss the relevance of the changes to the client's individual advisory needs and goals.

Item 14 Client Referrals and Other Compensation

Not Applicable. BradfordCrane Company does not receive any economic benefits from any individuals that are not clients, for providing investment advice or other advisory services to BradfordCrane clients. BradfordCrane Company does not compensate (directly or indirectly) other companies or their employees for referrals.

Item 15 Custody

Not Applicable. BradfordCrane Company does not maintain custody of client funds or securities. Clients are highly encouraged to compare the account statements received from qualified custodians with invoices and reports received from BradfordCrane Company.

Item 16 Investment Discretion

BradfordCrane Company does not manage client assets on a discretionary basis. A BradfordCrane investment adviser contract *does not grant discretionary power to the adviser or any representative of the BradfordCrane Company*.

Item 17 Voting Client Securities

BradfordCrane Company does not accept authority to vote client securities.

Item 18 Financial Information

BradfordCrane Company does not require or solicit payment of more than $500, six months or more in advance. The Company does not have discretionary authority or custody of client funds or securities. Neither BradfordCrane Company nor its owner or any of its supervised persons have been the subject of a bankruptcy petition at any time during the past ten years. In addition, neither BradfordCrane Company nor its owner has a financial condition that is reasonably likely to impair the company's ability to meet contractual commitments to clients.

Item 19 Requirements for State-Registered Advisers

Terry Bradford-Crane periodically instructs as an adjunct professor at California Lutheran University. Adjunct professor contracts are on a case-by-case basis, term by term basis. Contracts are established between California Lutheran University and Ms. Bradford-Crane and are in no way affiliated with BradfordCrane Company.

BradfordCrane Company does not have any relationship or affiliation with an issuer of securities.

19A. Education and business background of executives and management persons:

Terry Bradford-Crane, Owner
B.S. Political Science, United States Naval Academy, 1990
MBA (Financial Planning), California Lutheran University, 2011
CFP® Certificant, 2020

Professional/Business Background
Naval Flight Officer, US Navy, 1990-1998
Merrill Lynch Financial Advisor (CFM), 1998-2002
Owner, BradfordCrane Company, 2004 - present
Adjunct Faculty/Lecturer, California Lutheran University, 2015 – 2022
Principal/ Financial Manager, Allied Approach Group LLC, 2019 – Present

About the CFP® Designation

The CERTIFIED FINANCIAL PLANNER®, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and several other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. In 2023, the United States had a total of 98,875 CFP® professionals. The Financial Planning Standards Board reported that there were 223,770 certified financial planners worldwide.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfil the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services. CFP Board's financial planning subject areas include professional conduct and regulations, general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement savings and income planning, estate planning, the psychology of financial planning and a financial plan development capstone course.

  A bachelor's degree or higher in any discipline from an accredited college or university is required for CFP® certification.

  Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year). There are varied ways to meet this requirement, including an apprenticeship pathway.

- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the S*tandards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

19B. Other businesses in which BradfordCrane Company or Terry Bradford-Crane is engaged.

Terry Bradford-Crane is the managing partner of Allied Approach Group, LLC, an aviation test and evaluation consulting firm. Allied Approach Group provides flight organizations with procedural and technical solutions for in-flight processes, as well as flight test support services. Please see Item 10 on page 19, Item 19A on page 23, and the biography of Terry Bradford-Crane on page 27.

19C. Terry Bradford-Crane is the principal and sole managing member of BradfordCrane Company. Clients are *not* charged performance-based fees. Performance-based compensation may create an incentive for an advisor to recommend an investment that may carry a higher degree of risk to the client. BradfordCrane clients pay a fee for regularly scheduled consultations. BradfordCrane Company is compensated for thoughtful, client specific investment advisory services. The Company's mission is to educate, encourage and motivate clients *to reach for their own specifically defined goals and objectives along their own specifically defined financial planning journeys.* Please see the pay schedule for advisory services on pages 5 - 6.

19D. Management involvement in material, investment related disciplinary proceedings. None.

1. In the case of an award or otherwise being *found* liable in an arbitration claim alleging damages in excess of $2,500, BradfordCrane Company:

(a) ***has not*** been found liable in an investment or an *investment-related* business activity;

(b) ***has not*** been found liable for fraud, false statement(s), or omissions;

(c) ***has not*** been found liable for theft, embezzlement, or other wrongful taking of property;

(d) ***has not*** been found liable for bribery, forgery, counterfeiting, or extortion; and

(e) ***has not*** been found liable for dishonest, unfair, or unethical practices.

2. With regard to an award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following, BradfordCrane Company:

(a) ***has not*** been found liable in an investment or an *investment-related* business activity;

(b) ***has not*** been found liable for fraud, false statement(s), or omissions;

(c) ***has not*** been found liable for theft, embezzlement, or other wrongful taking of property;

(d) ***has not*** been found liable for bribery, forgery, counterfeiting, or extortion; and

(e) ***has not*** been found liable for dishonest, unfair, or unethical practices.

Conflicts of Interest

Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the client prior to entering into any Advisory or Financial Planning Agreement.

Business Continuity Plan

BradfordCrane Company maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including death of the investment adviser or any of its representatives.

Biography: About Terry Bradford-Crane

Terry Bradford-Crane is a CERTIFIED FINANCIAL PLANNER® practitioner with over 25+ years of financial services industry experience as a financial advisor and registered representative, financial literacy advocate, guest speaker, or educator

In 1998, after her accomplished career as an EA-6B Prowler naval flight officer, Terry relocated to Southern California and began her career as a financial adviser with Merrill Lynch in Oxnard, California. As a financial adviser and certified financial manager with Merrill Lynch, she managed a multi-million-dollar book of cash and securities for high-net-worth individuals and businesses. Terry regularly performed individual financial plan presentations to clients and developed and implemented financial planning strategies for cash and debt management, education planning, retirement planning, risk management, tax planning and estate planning.

In August 2002, Terry left Merrill Lynch to devote more time to her rapidly growing family. She founded BradfordCrane Company in August 2004 to serve as a business platform that enabled her to educate individuals on investment topics, inspire investors to reach for their own financial independence, deliver presentations on portfolio development and the "art" of selecting an appropriate financial advisor, and provide pro bono financial planning advice to organizations and individuals as a service to her community. Additionally, Terry was an adjunct faculty member for the California Lutheran University MBA in Financial Planning Program.

Terry is a member of the XY Planning network and the Financial Planning Association of Puget Sound. She is the owner and editor of PeaceOfMindWaypoints.com, a financial planning topics focused blog that focuses on sharing financial planning wisdom. Terry is the managing partner of Allied Approach Group, LLC, an aviation test and evaluation consulting firm. She volunteers for the Foundation for Financial Planning and multiple business leadership and mentoring programs.

Terry holds a Bachelor of Science in Political Science from the United States Naval Academy, and a Master of Business Administration (Financial Planning) from California Lutheran University.