

Broadhurst Financial Advisors, Inc.
A Registered Investment Adviser

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Form ADV Part 3

We are registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at <http://investor.gov/crs>, which also provides educational materials about broker-dealers, investment advisers and investing.

Relationships and Services

What investment services and advice can you provide me?

Our firm offers investment advisory services, which are fully described in our Form ADV Part 2A (“Disclosure Brochure”). Our services include portfolio management and financial planning services. As part of our standard services, we monitor investments that we manage on a continuous and ongoing basis. Financial planning and investment consulting recommendations are not actively monitored. There are no material limitations to our monitoring. We accept discretionary authority to implement the recommended transactions in client accounts. The level of discretion is determined in our agreement and there are no material limitations on the authority. We offer advice on equity securities, exchange-traded funds (“ETFs”), and mutual funds. Where appropriate, we provide advice about any type of legacy position or other investment held in your portfolio; however, you should not assume that these assets are being continuously monitored or otherwise advised on by us unless specifically agreed upon. Our services are subject to an account size of \$3,000,000.

Additional information about our services can be found in Items 4, 5 and 7 of our Disclosure Brochure and available to all clients or by going here: <https://adviserinfo.sec.gov/firm/summary/132332>

Let’s discuss... Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Feeds, Costs, and Standards of Conduct

What fees will I pay?

The fees for these types of services are negotiated between the client and the Firm. We charge a fee for the assets under our management. This fee ranges between .50% and 1.25% based on the assets under our management. The fees are negotiable at our discretion. Fees are due quarterly and paid in advance. Fees are based on the value of Clients’ assets at the end of the previous quarter. We may also charge a fixed fee, quoted in advance. Fees are negotiated based on the scope, complexity and deliverables required by the Client. Infrequently, we may provide advice based on an hourly rate of \$350 per hour.

In addition to the advisory fees paid to us, you also incur certain charges imposed by other third parties, such as broker-dealers, third-party money managers and custodians. These charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by independent managers, margin costs, charges imposed directly by a mutual fund or ETF in a client’s account as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), 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.

The more assets there are in your advisory accounts, the more you will pay in fees, so the firm may therefore have an incentive to encourage you to increase the assets in your account or manage them in a way where we receive higher fees. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Additional information about our fees can be found in Item 5 of our Disclosure Brochure and available to all clients or by going here: <https://adviserinfo.sec.gov/firm/summary/132332>

Let's discuss... Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- Our firm and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. In such circumstances, our firm or its investment adviser representatives may have a financial interest in recommending investments that our firm or its representatives also own.

Let's discuss... How might your conflicts of interest affect me, and how will you address them?

Additional information about our conflicts of interest can be found throughout our Disclosure Brochure and available to all clients or by going here: <https://adviserinfo.sec.gov/firm/summary/132332>

How do your financial professionals make money?

Our financial professionals are compensated based on the following factors and conflicts of interest: Jeffrey Broadhurst is paid a fixed base salary, and, as the owner of the firm, is paid based on the profits of the company. The profits of the firm are based on our assets under management which means we have an incentive to recommend that you have more assets under our management which presents a conflict of interest.

Additional information about our financial professionals can be found on their respective Form ADV Part 2 Brochure Supplements that you will be provided.

Do you or your financial professionals have legal or disciplinary history? For what type of conduct?

No, neither we nor our financial professionals have a legal or disciplinary history. You can visit <http://investor.gov/crs> for a free and simple search tool to research us and our financial professionals.

Let's discuss... As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

To obtain additional information regarding our services or to request a copy of this relationship summary, please contact us (215) 325-1595.

Let's discuss... Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Our Firm and its representatives have a fiduciary duty to all clients. Please call us at (215) 325-1595 if you have any concerns.