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## ITEM 1: COVER PAGE – FIRM BROCHURE

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**Bridge Capital Consulting, LLC**

**DBA: “Bridge Financial Management”**

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www.BridgeCapitalConsulting.com

**Form ADV Part 2A**

**March 7, 2023**

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This Brochure provides information about the qualifications and business practices of Bridge Capital Consulting, LLC (DBA Bridge Financial Management), “BCC”. If you have any questions about the contents of this Brochure, please contact us at (949) 229-2262. 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.

Bridge Capital Consulting, LLC is registered as an Investment Adviser with the State of California. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about BCC is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 283663.



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## ITEM 2: MATERIAL CHANGES

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### 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 BCC.

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 firm CRD number, 283663.

You may also request a copy of this Disclosure Brochure at any time by contacting us at (949) 229-2262 or [DPichardo@myBridgeCapital.com](mailto:DPichardo@myBridgeCapital.com).

Since the last annual amendment of the ADV, Part 1 and Part 2A filings in 2022, we have made no material changes.



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## ITEM 4: ADVISORY BUSINESS

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### Description of Advisory Firm

**Bridge Capital Consulting, LLC (BCC)** is registered as an Investment Adviser with the State of CA and WA, founded in April 2016 by Daniel Anthony Pichardo, the principal owner and managing member of BCC. Bridge Capital Consulting became registered as an investment adviser in June 2016 in the State of California. Bridge Capital Consulting, LLC is currently managing approximately \$41,800,000 of assets on a discretionary basis and \$3,200,000 on a non-discretionary basis. BCC's total assets under management as of December 31, 2022 are approximately \$45,000,000.

At the onset of our relationship and on an ongoing basis, we will obtain from you the following information: age (or date of birth), annual income, total net worth (excluding primary residence), liquid net worth, employment status (if retired, former profession. If self-employed, type of business), fair market value of primary residence (and outstanding debt), tax status, which includes type of account, tax bracket, or tax strategy for the account(s), investment objectives, investment experience, investment time horizon, liquidity needs, risk tolerance, other investments, and any other information you may disclose to us in connection with recommendations or investment advice as well as other information we may ask based on our strategy. We will make reasonable efforts to document and update this information annually.

After reviewing your financial objectives and current situation, we may offer to provide you with financial planning services or investment management services. For our investment management services, we may manage the account for you or we may suggest the use of a third-party investment adviser. For accounts we refer to third parties, we may or may not have discretion. More information is contained within each of the descriptions of services listed below.

### Types of Advisory Services

#### 1. Investment Management Services (BCC Manages Accounts)

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives, based on a client's particular circumstances, are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.



Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. When servicing these accounts, we will request you provide us discretionary authority, which gives us the ability to buy and sell securities without receiving your prior approval. The accounts we manage typically hold stocks, bonds, exchange-traded funds and mutual funds. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure. When offering Investment Management Services in which we manage the accounts, BCC will exercise discretionary authority to buy and sell securities without first consulting with the client.

## **2. Investment Management Services (Outside Manager Manages Accounts)**

We offer investment management services by referring clients, where appropriate, to third-party money managers (“Outside Managers”) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager’s investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Client may impose reasonable restrictions on their account. And may contact the Outside Manager directly with any questions or about the advice given to their account. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

Our firm intends to primarily allocate investment management assets of our client accounts among various investment management programs offered through Betterment, CRD #: 149117 (“BMT”), American Funds Service Company, also known as The Capital Group (“AFS”), SEI Investments Company, CRD # 105146 (“SEI”), AssetMark, Inc., CRD # 109018 (“AssetMark”) on a non-discretionary basis in accordance with the investment objectives of our client.

In order for us to manage your assets, you will be required to enter into an investment advisory agreement with BCC and an agreement with Betterment, American Funds, AssetMark, and/or SEI. The agreements will set forth the terms and conditions of our relationship, including the amount of your investment advisory fee. You will retain all rights of ownership on your account, including the right to withdraw securities or cash, as well as your right to vote proxies. In addition, you will also have the ability to impose restrictions on investing in certain securities or types of securities at the time you open an account. You may contact the Third-Party manager with any questions you have about your account. Third-Party Managers, such as those we have selected to work with, work through Registered Investment Advisers such as BCC, and you cannot typically work with them directly (except for Betterment), without having an arrangement with BCC or a similarly registered firm.

### **Custodian 1: SEI Investments Company (“SEI”)**



Our firm recommends that certain clients allocate investment assets among the various mutual fund and exchange traded fund (“ETF”) asset allocation models, and/or independent investment manager programs offered through SEI Investments Company (“SEI”). SEI is a global asset management company and sponsor of its own proprietary mutual funds. SEI Private Trust Company (“SEI Trust”), a subsidiary of SEI, serves as custodian for each SEI account (SEI and SEI Trust collectively referred to as “SEI”). SEI provides each client with reporting services, including consolidated monthly statements, quarterly performance reports, and year-end tax reports. SEI enables investment advisers such as our firm to offer our clients mutual fund asset allocation models, underlying individual mutual funds, ETFs, and investment management programs that are not otherwise available to the general public. As part of its overall investment management program, SEI offers quarterly rebalancing of each client’s investment assets for the purpose of maintaining the assets in accordance with the client’s previously designated percentage (%) asset allocations for the SEI account, if elected by the client. If a client desires automatic account rebalancing, he/she must first provide such authorization directly to our firm, who will then advise SEI accordingly. If the client selects a customized model rather than an SEI asset allocation model, the client’s account will not be eligible for automatic rebalancing by SEI. In this case, our firm will provide recommendations for rebalancing based on the client’s goals and objectives. Our firm shall not remove client accounts from SEI to another program without the client’s consent. The fees charged by SEI are exclusive of, and in addition to, our firm’s investment management fee. In addition to our firm’s investment management fee, the client, relative to all mutual fund and ETF purchases, shall also incur charges imposed at the mutual fund level and ETF level (e.g., management fees and other fund expenses). Although SEI will have discretionary authority to buy and sell securities on your behalf, we do not have discretionary authority for accounts managed within the SEC asset allocation models or independent investment manager programs offered through SEI.

#### **Custodian 2: Betterment for Advisors (“Betterment” or “BMT”)**

Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities’ services are described in more detail in Item 12 Brokerage Practices of this document. You appoint us as your investment adviser and grant us limited power-of-attorney with discretionary trading authority over the Assets to buy, sell and otherwise effect investment transactions related to the Assets. You authorize us, without prior consultation or approval to (a) implement transactions for your Assets; (b) buy, sell and trade stocks, bonds, mutual funds, index funds, exchange traded funds, short-term money-market instruments and other securities and contracts, including on margin if you have signed a separate margin authorization; (c) give instructions to the broker-dealer and the custodian of your Assets; and (d) delegate the management of all or part of the Assets to one or more independent investment managers or independent investment management programs (“Independent Managers”). To the extent



utilized, Independent Managers will have limited power-of-attorney and trading authority over those Assets we direct to them for management. They will be authorized to buy, sell and trade in accordance with your Investment Needs and to give instructions, related to their authority, to the broker-dealer and the custodian of your Assets. We will supervise the Independent Managers and monitor and review Asset allocation, and Asset performance. We may terminate or change Independent Managers when, in our sole discretion, we believe such termination or change is in your best interest. Please refer to Item 12 for more information regarding Betterment.

### **Custodian 3: Capital Group /American Funds Service Company (“AFS”)**

AFS follows The Capital System<sup>SM</sup> approach, as described in more detail in Item 12 Brokerage Practices of this document. You appoint us as your investment adviser and grant us limited power-of-attorney with discretionary trading authority over the Assets to buy, sell and otherwise effect investment transactions related to the Assets. You authorize us, without prior consultation or approval to (a) implement transactions for your Assets; (b) buy, sell and trade mutual funds; (c) give instructions to the broker-dealer and the custodian of your Assets; and (d) delegate the management of all or part of the Assets to one or more independent investment managers or independent investment management programs (“Independent Managers”). To the extent utilized, Independent Managers will have limited power-of-attorney and trading authority over those Assets we direct to them for management. They will be authorized to buy, sell and trade in accordance with your Investment Needs and to give instructions, related to their authority, to the broker-dealer and the custodian of your Assets. We will supervise the Independent Managers and monitor and review Asset allocation, and Asset performance. We may terminate or change Independent Managers when, in our sole discretion, we believe such termination or change is in your best interest. Please refer to Item 12 for more information regarding AFS.

### **Custodian 4: AssetMark, Inc. (“AssetMark”)**

Our firm recommends that certain clients allocate investment assets among the various mutual fund and exchange traded fund (“ETF”) asset allocation models, underlying mutual funds and ETFs, and/or independent investment manager programs offered through AssetMark.

**Description of Services:** AssetMark offers retail investors a broad range of investment advisory services designed to meet your investment needs while balancing your tolerance for risk. AssetMark’s services are available to you through your financial advisor or financial professional (“financial professional”). Your financial professional is independent and is not an AssetMark employee. Your financial professional will work closely with you to examine your financial situation and financial goals, understand your risk tolerance and investment time horizon, help you select an appropriate investment strategy for your AssetMark account(s) and assist you with your AssetMark account(s).

**Monitoring:** AssetMark will monitor your account. Securities and other assets will be purchased and sold in the account consistent with your selected investment strategy.



**Investment Authority:** AssetMark offers you discretionary and non-discretionary advisory services. In a discretionary arrangement, you can grant AssetMark the authority to take certain actions on your behalf that are consistent with your investment strategy and without asking for your consent in advance, such as determining the securities or other assets to purchase or sell in the account, or replacing investment firms (other than your financial professional) that provide services. As a sponsor of the AssetMark Platform (used by your financial professional), AssetMark provides administrative services, such as account administration and internet-based software tools, to help your financial professional provide services to you. For accounts managed by AssetMark, we will have no discretionary authority.

**Account Minimums and Other Requirements:** Account minimums range from \$10,000 to \$1,000,000 depending on the investment strategy selected.

**Additional Information:** For more information on advisory services and relationships, visit AssetMark's website at <https://www.assetmark.com/info/disclosure>, Form ADV Part 2A.

### 3. Financial Planning

We provide financial planning services on topics such as retirement planning, risk management, investments management, insurance and annuities, college savings, cash flow, debt management, work benefits, business planning, and estate and incapacity planning.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using 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 will be considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial 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:

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies





and other financial goals, along with a review of accounts for such reserves, plus strategies to save desired amounts.

- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute.
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request. We are not compensated by any outside parties for these referrals to attorneys or accountants. We recommend accountants or attorneys based on previous interactions, reputation, and expertise.
- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance and Annuities:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile, as well as annuities.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For



situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional and other professionals with your approval. We are not compensated by any outside parties for these referrals to attorneys or accountants. We recommend accountants or attorneys based on previous interactions, reputation, and expertise.

#### 4. eMoney Advisor Platform

Bridge Capital Consulting, LLC may provide its clients with access to an online platform hosted by eMoney Advisor Advisors, LLC (“eMoney” or “myBridge”). eMoney provides an interactive wealth management platform for advisors and their clients. It features an intuitive interface, powerful integrations and multiple financial planning options. It also gives them access to a variety of financial reports, investment analytics, and a secure vault where they can store their important documents. The eMoney platform allows a client to view their complete asset allocation, including those assets that Bridge Capital Consulting, LLC does not manage (the “Excluded Assets”). Bridge Capital Consulting, LLC does not provide investment management, monitoring, or Bridge Capital Consulting, LLC – ADV Part 2A implementation services for the Excluded Assets. The client may choose to engage Bridge Capital Consulting, LLC to manage some or all of the Excluded Assets pursuant to the terms and conditions of an Investment Advisory Agreement between Bridge Capital Consulting, LLC and the client. The eMoney platform also provides access to other types of information, including financial planning concepts. The generated reports are provided for educational purposes only and the client should not rely on it as the primary basis for insurance,



investment, financial, or tax planning decisions. The generated report is not a recommendation of any investment strategy or transaction, rather it is a tool for Bridge Capital Consulting, LLC and the client to collaboratively: (i) confirm the accuracy of the information on the client's risk tolerance, investment objectives and other personal and financial information, and (ii) solicit the client's input and feedback in order to refine the approach for the client's financial future. Bridge Capital Consulting, LLC shall not be held responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the eMoney platform without Bridge Capital Consulting, LLC assistance or oversight.

### **Client Tailored Services and Client Imposed Restrictions**

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

### **CCR Section 260.235.2 Disclosure**

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 upon our recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through our firm. Clients have the option to purchase investment products we recommend through other brokers or agents that are not affiliated with BCC or our representatives.

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## ITEM 5: FEES AND COMPENSATION

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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 and without penalty. Thereafter, either party can terminate the agreement by delivery of a 30-day notice to the other party. This notice includes but is not limited to, phone or email. After termination you may, if you choose, keep your assets at the Third-Party investment adviser, subject to any restrictions that investment adviser may have in place. BCC's annual advisory fee will be prorated through the date of termination and any remaining balance shall be refunded to the client in a timely manner. For any partial billing period, the advisory fee will be prorated based upon the number of days the account was open during the billing period. How we are paid depends on the type of advisory service we are performing, and the Custodian where your account is held. Please review the fee and compensation information and schedules below.

- (a) The annual investment management service fee per account is determined by the below schedule, depending on the platform/custodian chosen (SEI, Betterment, AssetMark, or "AFS"). The annual fees are negotiable and paid in the manner described below for each custodian.
- (b) You authorize us and the Independent Managers to deduct the Advisory Fee directly from the account(s) where such Assets are held, pursuant to applicable custody rules. We urge you to compare the account statements you receive from your custodians to the fees noted on your fee invoice.
- (c) Advisory fees are directly debited from client accounts, or the client may choose to pay by check or electronically. Financial planning fees may be paid by check or electronically. For fees paid by an electronic funds transfer, the Adviser will use an independent 3<sup>rd</sup> party payment processor in which the client can securely input their banking information and pay the advisory fee through their own secure portal. The Adviser does not maintain continuous access to the client's banking information. The fees will be paid through one-time payment requests for each billing period. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. For any partial billing period the advisory fee will be prorated based upon the number of days the account was open during the billing period. An account may be terminated with notice, including e-mail or telephone notice, at least 30 calendar days in advance. Upon termination of the account, any unearned fee will be refunded to the client. For fees that are paid in advance, clients will receive a pro-rata refund of fees based on the amount of time remaining in the billing period as well as an invoice showing the amount of earned fees retained by the Adviser and the amount of fees returned to the client.

- (d) Outside Manager or Custodian will deduct the advisory fee and forward Adviser's portion of the fee to the Adviser. In addition to the Advisory Fee, unaffiliated third parties may impose certain charges. These charges may include, but are not limited to, fees charged by Independent Managers, custodial fees, brokerage commissions, transaction fees, charges imposed directly by a mutual, hedge, index or exchange traded fund, fees imposed by variable annuity providers, certain deferred sales charges, odd-lot differentials, transfer taxes, and wire transfer and electronic fund fees.
- (e) The Outside Manager receives compensation for its services in the form of Advisory fees. These fees are dependent on a myriad of factors, including the selected program, underlying investments, amount of funds invested, as well as the Manager itself. In certain circumstances, the fees charged by the Outside Manager may be reduced or waived due to investments in products for which the Outside Manager is the named adviser. For specific information about these situations, conflicts and fees, we urge you to review the Form ADV 2 of the Outside Manager(s) responsible for the management of your assets. The Third-Party managers who receive Advisory Fees, sometimes called Sub-Advisory Fees, in addition to our fees, are SEI, Betterment, and AssetMark. For the programs we recommend, SEI charges between a Sub-Advisory Fee of between 0% and 0.65%. Betterment charges a sub-advisory fee of 0.25%. AssetMark's fee, for the services we recommend are between 0.10% and 1.20%. American Funds/The Capital Group, does not charge additional Advisory Fees outside of our fees, however their funds do have expense ratios. Accounts at SEI that are invested in Mutual Funds do not pay an additional Advisory Fee however their funds do have expense ratios.
- (f) 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 (if applicable), the amount of assets under management on which the fee is based, and the name of the custodian(s). 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.
- (g) Unmanaged or static assets will not be included in the Adviser's management fee calculation.
- (h) Management fees charged in arrears are based upon the market value on the last day of the billing period and management fees charged in advance are based upon the market value on the last day of the preceding month/quarter. For AssetMark accounts, management fees are charged in advance and based upon the average daily balance of the assets during the preceding month/quarter.



- (i) Clients may combine multiple household accounts to receive a lower tiered schedule fee. We note any such household accounts on our advisory agreement.

Payment of our portfolio management fees will be made by the qualified custodian holding the client's funds and securities, provided the following requirements are met:

- We have authorization from you, in writing, permitting the fees to be paid directly from your account held by the qualified custodian.
- We send you an invoice showing the amount of the fee, the asset valuation used to calculate the fee, and how the fee was calculated.
- The qualified custodian agrees to send you a statement, at least quarterly, showing all funds that came out of your account including the amount of the advisory fee paid directly to our firm.

We may deduct the fee from a designated account to facilitate billing. We will send you an invoice detailing the fees deducted from your account.

### Investment Management Services Fee Schedule - "SEI"

BCC charges a fee based upon a percentage of the market value of the assets under management. On an annualized basis, fees will be subject to the following fee schedule or as agreed upon in the Advisory Client Agreement:

Account Value	Annual Advisory Fee
\$0 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.35%
\$1,000,001 - \$1,500,000	1.20%
\$1,500,001 - \$2,500,000	0.90%
\$2,500,001 - \$5,000,000	0.70%
\$5,000,000 and Above	0.50%

The BCC annual advisory fee for SEI is pro-rated and paid in arrears on a monthly basis. The advisory fee is calculated by assessing the percentage rates, as shown in the above chart or as agreed upon, to the account value as of the last date of the previous month. The formula to calculate the fee is: Annual Rate X Average Available Balance X (Number of Days in Billing Period / Number of Days in Year). For example, if the client's average available balance is \$1,000,000 during the previous billing period, the annual fee is 0.90%, and there are 30 days in the billing period, and 365 days in the year, the quarterly fee will be calculated as follows: 0.90% (0.0090) x \$1,000,000 x (30 / 365 (0.0822)) = \$739.73. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. Additionally, SEI may charge a



“Sub-Adviser” fee calculated in the same way as described above, however on a quarterly basis instead of monthly. BCC will provide a detailed invoice of fees for each account every time fees are deducted. Actual fee is agreed upon in the Advisory Client Agreement.

### Investment Management Services Fee Schedule - “Betterment”

BCC charges a fee based upon a percentage of the market value of the assets under management. On an annualized basis, fees will be subject to the following fee schedule or as agreed upon in the Advisory Client Agreement:

Account Value	Annual Advisory Fee
\$0 - \$250,000	0.95%
\$250,001 - \$500,000	0.85%
\$500,001 - \$1,000,000	0.75%
\$1,000,001 and Above	0.65%

The BCC annual advisory fee for Betterment is pro-rated and paid in arrears on a monthly basis. The advisory fee is calculated based on the weighted average daily account balance during the month for Betterment’s and Betterment Securities’ services. The advisory fee is subject to waiver or reduction by Betterment in its sole discretion. The value of the Account for advisory fee calculation purposes will be determined by Betterment in accordance with its normal practices and procedures. You authorize such advisory fees to be deducted directly from your Betterment account. The advisory fee is calculated by assessing the percentage rates, as shown in the above chart or as agreed upon, to the account value as of the last date of the previous month. The formula to calculate the fee is:  $\text{Annual Rate} \times \text{Daily Billable Balance} \times (\text{Number of Days in Billing Period} / \text{Number of Days in Year})$ . For example, if the client’s average available balance is \$1,000,000 during the previous billing period, the annual fee is 0.75%, and there are 30 days in the billing period, and 365 days in the year, the quarterly fee will be calculated as follows:  $0.75\% (0.0075) \times \$1,000,000 \times (30 / 365 (0.0822)) = \$616.44$ . No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. Additionally, BMT charges a “Sub-Adviser” fee monthly calculated in the same way as described above. BCC will provide a detailed invoice of fees for each account every time fees are deducted. Actual fee is agreed upon in the Advisory Client Agreement.

### Investment Management Services Fee Schedule - “Assetmark”

BCC charges a fee based upon a percentage of the market value of the assets under management. On an annualized basis, fees will be subject to the following fee schedule or as agreed upon in the Advisory Client Agreement:

Account Value	Annual Advisory Fee
\$0 - \$1,200,000	0.90%
\$1,200,001 - \$1,600,000	0.80%
\$1,600,001 - \$2,000,000	0.70%
\$2,000,001 - \$5,000,000	0.60%
\$5,000,001 and Above	0.50%

The BCC annual advisory fee and the AMK sub-advisory fee for assets held at AssetMark is pro-rated and paid in advance on a quarterly basis. The advisory fee for the upcoming quarter is calculated by assessing the percentage rates, as shown in the above chart or as agreed upon, to the account value as of the last date of the previous quarter. The formula to calculate the fee is: Previous Quarter-End Balance X Annual Rate X (Number of Days in Quarter / Number of Days in Year). For example, if the client's balance at the end of the previous quarter is \$1,000,000, the annual fee is 0.90%, and there are 91 days in the quarter and 365 days in the year, the quarterly fee for the upcoming quarter will be calculated as follows: \$1,000,000 X 0.90% (0.0090) X (91 / 365 (0.2493)) = \$2,243.70 No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. Additionally, AssetMark may charge a "Sub-Adviser" fee calculated in the same way as described above. BCC will provide a detailed invoice of fees for each account every time fees are deducted. Actual fee is agreed upon in the Advisory Client Agreement.

### Investment Management Services Fee Schedule - "AFS"

BCC charges a fee based upon a percentage of the market value of the assets under management. On an annualized basis, fees will be subject to the following fee schedule or as agreed upon in the Advisory Client Agreement:

Account Value	Annual Advisory Fee
\$0 + (All Values)	0.75%

The BCC annual advisory fee for assets held at AFS is pro-rated and paid in arrears on a quarterly basis. The advisory fee is calculated by assessing the percentage rates, as shown in the above chart or as agreed upon, to the account value based on the average available balance during the previous quarter. The formula to calculate the fee is: Annual Rate X Average Available/Ending Balance X (Number of Days in Quarter / Number of Days in Year). For example, if the client's average/ending available balance is \$1,000,000 during the previous quarter, the annual fee is 0.75%, and there are 91 days in the quarter and 365 days in the year, the quarterly fee will be calculated as follows: 0.75% (0.0075) x \$1,000,000 x 91 / 365 = \$1,869.86. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. Additionally, AFS may charge a "Sub-Adviser" fee calculated in the same way as described above, but





currently AFS does not charge a Sub-Adviser fee. BCC will provide a detailed invoice of fees for each account every time fees are deducted. Actual fee is agreed upon in the Advisory Client Agreement.

## Fees for Financial Planning

Financial Planning will generally be offered on a fixed fee or hourly basis. Our hourly fee relationships are suited for small financial planning questions or concerns. Our hourly fee is \$250 per hour. To derive the fixed fee for a financial planning relationship, we will estimate the number of hours we anticipate a plan taking us, and will calculate the fee based on \$250 per hour multiplied by the number of hours. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$250 and \$12,000. The fee is negotiable. Clients have the option of paying their financial planning fees in advance or they may pay half of the fee at the beginning of process and the remainder at completion of work. Our plans are typically completed within one to three months of beginning the relationship. BCC will not bill an amount above \$500.00, 6 or more months in advance. If the service that is provided does not meet the required hourly threshold, the amount due will be reduced according to the service that was completed and any unearned fee will be refunded to the client. If a client terminates its relationship with us before the written financial plan or analysis is completed, the Adviser will deliver any completed portions of any documents to the client.

## Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, 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.

## General Information on Advisory Services and Fees

A client could invest in a mutual fund, exchange-traded fund, or other investments directly, without the services of BCC. In that case, the client would not receive the services provided by BCC which are designed, among other things, to assist the client in determining which investments or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and



the fees charged by BCC to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

All conflicts of interest between you and our firm, and the Associated Persons of our firm, are outlined in this Disclosure Brochure. If additional conflicts arise in the future, we will notify you in writing or supply you with an updated Disclosure Brochure.

BCC does not provide legal or accounting services. With your consent, we may work with other professional advisors, such as an estate planning attorney or an accountant, to assist with the coordination and implementation of accepted strategies. You should be aware that these other advisors will charge you separately for their services and these fees will be in addition to our own advisory fees.

We do not represent, warrant, or imply that the services or methods of analysis employed by our firm can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

Financial Planning fees will be offset for related advisory services of assets being managed by the Adviser.

Apart from the ability to instruct the qualified custodian to deduct fees from client accounts, we shall never have custody of any client funds or securities, as the services of a qualified and independent custodian will be used for these custodial services. We will send you an invoice for the payment of our advisory fee, or we will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

### CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources. Fees may be higher than normally charged in the industry. Similar services may be offered by another adviser at a lower fee.



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## ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

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We and our Associated Persons do not accept performance-based fees. Performance based fees are based on a share of capital gains on or capital appreciation of the client's assets.

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## ITEM 7: TYPES OF CLIENTS

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We provide financial planning and portfolio management services to individuals, business owners, high net-worth families, and charitable organizations. We do not have a minimum account size requirement.

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## ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

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The following outlines the types of investment strategies and methods of analysis that will be used in managing your account. It is important to keep in mind that there is no specific approach to investing that guarantees success or positive returns; investing in securities involves risk of loss that clients should be prepared to bear.

We take a top down approach by evaluating global economies and capital markets. We then try to take a closer look at sectors and industries to see where we can find a competitive edge with the goal to reduce portfolio risk. We also take a broad look at assets classes and then try to determine which asset classes we believe may outperform/underperform under current economic and financial conditions.

We do not engage in active or short-term trading when managing accounts. Accounts that select an asset allocation model are typically set up so that the manager will rebalance the accounts as necessary when the percentages of certain holdings exceed or fall below target allocations. Our firm will make rebalancing recommendations to the client for accounts that do not select an asset allocation model.

Our goal is to take a comprehensive financial planning approach that encompasses investments, income taxes, retirement income, insurance and protection, and estate planning. We start by gathering the essential data; we then try to establish goals and objectives with the client. We attempt to match the client's goals, risk tolerance, and cash flow needs with a suitable investment allocation. Through our regular meetings, we will continually monitor the client's objectives and adjust the portfolio based on any changes that may take place.



We generally use the following types of investment vehicles within asset management accounts: Individual stocks and bonds, exchange-traded funds (ETFs) and mutual funds (ie: asset allocation, index, international, emerging market, real estate, and high yield bond funds). The particular investments selected for your account will depend upon your investment objective, level of risk tolerance, sensitivity to taxes, and other factors.

There are risks associated with investing in securities. The following highlights some of the risks associated with the types of investments that may be purchased for your account:

- Investing in international markets presents additional risks including currency fluctuations, the potential for diplomatic and political instability, regulatory and liquidity risks and foreign taxation among others. The risks of foreign investing are generally greater in emerging markets.
- High yield bonds carry greater risks than bonds rated as investment grade, and are issued by organizations that do not qualify for an investment grade rating by one of the rating agencies because of the potential for higher default by the issuer. Another risk is that further financial difficulties by the issuer may result in a decrease in the market value, and this may make it impossible to liquidate the bond prior to maturity.

We generally recommend that clients invest at least 1% of their overall assets into a money market fund recommended by SEI. In most cases, this partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to asset management service, as applicable.

We use a variety of sources of data to conduct our economic, investment and market analysis, such as financial newspapers and magazines, economic and market research materials prepared by others, conference calls hosted by mutual funds, corporate rating services, annual reports, prospectuses, and company press releases.

## Material Risks Involved

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 performance.

**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.

**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.



**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.

**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). 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.

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## ITEM 9: DISCIPLINARY INFORMATION

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of BCC or the integrity of our management.

For disciplinary information for Daniel Anthony Pichardo and other Investment Advisor Representatives (IARs) of BCC, you can visit: <https://www.adviserinfo.sec.gov/IAPD/IAPDSearch.aspx>

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## ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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Daniel Anthony Pichardo, and other Investment Advisor Representatives (IARs) of BCC, are not registered, and do not have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Daniel Anthony Pichardo, and other Investment Advisor Representatives (IARs) of BCC, are not registered, and do not have an application pending to register, as a futures commissions merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

As noted in Item 4 above, BCC recommends outside advisers for our clients. Before recommending these advisers, BCC verifies that they are properly licensed or registered as an investment adviser.



Daniel Anthony Pichardo is an active, non-captive insurance agent, who does not currently operate or transact business.

**Disclosure of Material Conflicts** - All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding BCC, its representatives, or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

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## ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

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As a fiduciary, our firm 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 of our dealings.

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. We will, upon request, promptly provide a complete code of ethics. A summary of the Code of Ethics' Principles is outlined below:

- **Integrity** - Associated persons shall offer and provide professional services with integrity.
- **Objectivity** - Associated persons shall be objective in providing professional services to clients.
- **Competence** - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- **Fairness** - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest.
- **Confidentiality** - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- **Professionalism** - Associated persons' conduct in all matter shall reflect credit of the profession.
- **Diligence** - Associated persons shall act diligently in providing professional services.

Our firm and its "related persons" (associates, their immediate family members, etc.) may buy or sell securities the same as, similar to, or different from, those we recommend to clients for their accounts. Neither the Adviser nor any related person recommend to clients, or buys or sells for client accounts, securities in which the Adviser or a related person has a material financial interest. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and



risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific securities transactions. Any exceptions or trading pre-clearance must be approved by our Chief Compliance Officer in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation. Neither an Adviser nor a related person is permitted to trade ahead of Client Accounts.

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## ITEM 12: BROKERAGE PRACTICES

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### Factors Used to Select Custodians and/or Broker-Dealers

Bridge Capital Consulting, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

- **Research and Other Soft-Dollar Benefits** – The Third-Party Managers we utilize offer us access to certain research and technology as part of our agreement to do business with them. There is no specified amount of asset or investment that qualifies us for this access, and we may or may not use the information that is available to assist us in providing services to you.
- **Brokerage for Client Referrals** - We receive no referrals from a broker-dealer or Third-Party in exchange for using that broker-dealer or Third-Party.
- **Clients Directing Which Broker/Dealer/Custodian to Use** – In order to be managed by a Third-Party investment manager, your account will need to be custodied by the custodian required by that Third-Party investment adviser.

### The Custodian and Brokers We Use

BCC does not maintain custody of your assets under its management, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We may recommend that our clients use one of the following qualified custodians as they are associated with the Third-Party managers we recommend.





For accounts managed by SEI Investments Management Corporation, assets will be custodied by SEI Private Trust Company, a limited purpose federally chartered thrift organization. Accounts managed by Betterment are custodied at MTG, LLC, which is also known as Betterment Securities. Betterment Securities is a registered broker/dealer. Accounts managed by American Funds Service Company, also known as The Capital Group (“AFS”), are comprised of mutual funds and do not have a separate custodian outside of the fund complex. Assets managed by AssetMark are custodied at AssetMark Trust company. One of these platforms allows us to manage accounts, and therefore should you request that we manage your account individually, we will recommend you select SEI Private Trust Company as a custodian.

## How We Select Brokers/Custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself, or to facilitate such services.
- Capability to facilitate timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

## Your Brokerage and Custody Costs

For our clients’ accounts that Betterment Securities maintains, Betterment Securities does not charge you separately for custody/brokerage services, but is compensated as part of the Betterment for Advisors (defined below) platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment and access to the Betterment for Advisors platform. The platform fee is an asset-based fee charged as a percentage of assets in your Betterment account. Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the investment management, brokerage and other platform services are purchased separately. Nonetheless, for those Clients participating in the Betterment for Advisors platform, we have determined that having Betterment Securities execute trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

## Services Available to Us Via Betterment for Advisors

Betterment Securities serves as broker-dealer to Betterment for Advisors, an investment and advice platform serving independent investment advisory firms like us (“Betterment for Advisors”). Betterment for Advisors also



makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment for Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment for Advisors' support services:

- **SERVICES THAT BENEFIT YOU.** Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities' services described in this paragraph generally benefit you and your account.
- **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment for Advisors also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:
  - Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.
  - Provide access to client account data (such as duplicate trade confirmations and account statements).
  - Provide pricing and other market data.
- **SERVICES THAT GENERALLY BENEFIT ONLY US.** By using Betterment for Advisors, we may be offered other services intended to help us manage and further develop our business enterprise. These services include:
  - Consulting (including through webinars) on technology and business needs.
  - Access to publications and conferences on practice management and business succession.

## Our Interest in Betterment Securities Services

The availability of these services from Betterment for Advisors benefits us because we do not have to produce or purchase them. In addition, we do not have to pay for Betterment Securities' services. [These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody.] We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment for Advisors and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of our transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services (see "How we select brokers/custodians") and not



Betterment for Advisors and Betterment Securities' services that benefit only us or that may not directly benefit you.

### Betterment for Advisors' Trading Policy

When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account. You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., to "time the market"). Betterment describes its trading policies in Betterment LLC's Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first 30-minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately 30-minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A.

*\*Investments held in a trust account are not protected from loss of value or from losses resulting from the management strategy employed. There is no assurance the goals of the strategies discussed will be met. Diversification may not protect against market risk.*

### Aggregating (Block) Trading for Multiple Client Accounts

Generally, we do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). As a result, you may pay more for the trading of securities than you would if your trades had been bunched/blocked with other clients.

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## ITEM 13: REVIEW OF ACCOUNTS

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### Portfolio Management Account Reviews



Daniel Anthony Pichardo, Principal/CCO, monitors and reviews client accounts and holdings on a continuous basis. On an annual, semi-annual, quarterly or as-requested basis, as requested by the client, Mr. Pichardo will meet with the client to review the investments in the account. Additional reviews may be offered in certain circumstances. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the client's financial situation or investment objectives, or a client's request.

During the regular review, the account's performance is compared against like-managed accounts to identify any unacceptable performance deviation. Additionally, reasonable client-imposed restrictions will be reviewed to confirm that they are being enforced. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

### Financial Plan Reviews

A financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan.

### Reports

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis. Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest. BCC will not provide written reports to Investment Management clients, unless requested in writing via email. These reports will summarize the investments in the client's account and provide information on how they have performed since inception.

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## ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

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Other than disclosed in Items 4 and 5 of this brochure, we do not receive any economic benefit, directly or indirectly from any Third-Party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals.

We receive a non-economic benefit from Betterment for Advisors and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of



Betterment for Advisors' and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

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## ITEM 15: CUSTODY

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BCC does not have custody, except for in the instance of withdrawing client fees. BCC sends a copy of the invoice to the custodian or trustee at the same time a copy is sent to the client. The custodian sends quarterly statements to the client showing all disbursements for the custodian account, including the amount of the advisory fees. Clients provide written authorization permitting BCC to be paid directly for their accounts held by the custodian or trustee. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct a custodian to deduct our advisory fees directly from your account. Your statements will be available for you to review on the activity section of your Betterment for Advisors account portal. You will also receive account statements directly from the custodian of your assets. You should carefully review those statements as well as any invoices or reports you receive from the Adviser or Third-Party investment adviser promptly.

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## ITEM 16: INVESTMENT DISCRETION

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For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

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## ITEM 17: VOTING CLIENT SECURITIES

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We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

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## ITEM 18: FINANCIAL INFORMATION

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Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months or more in advance.

Out of an abundance of caution, and to ensure that the firm has access to sufficient working capital, Bridge Capital Consulting, LLC accepted an \$82,000.00 EIDL (Economic Injury Disaster Loan) on 6/02/2020. The EIDL Loan was updated to \$300,200 on 7/9/2021 and \$331,000 on 10/11/2021. We believe we acted prudently at the time to help ensure our ability to meet continuing contractual obligations to our clients. Our balance sheet continues to meet regulatory net capital requirements.

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## ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

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**Daniel Anthony Pichardo, Managing Member of BCC (CRD# 5256800)**

**Year of Birth: 1982**

**Educational Background:**

- 2006 – Bachelor of Arts, Business Administration - Concentration in Finance, Cal State University, Fullerton
- 2000-2001 - Undergraduate studies at Pepperdine University - Malibu, CA

**Business Experience:**

- 06/2016 – Present, Bridge Capital Consulting, LLC, President, CEO, and CCO
- 10/2013 – 09/2016, Girard Securities, Inc., Investment Adviser/Registered Rep
- 07/2009 – 10/2013, LPL Financial LLC, Financial Advisor
- 01/2008 – 07/2009, Wells Fargo Advisors, LLC, Financial Advisor
- 06/2007 – 01/2008, A.G. Edwards & Sons, Financial Advisor

**Professional Designations, Licensing & Exams:**

**CERTIFIED FINANCIAL PLANNER™ or CFP®**

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 a number of 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. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill 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, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;



- **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); and
- **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 in order 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 *Standards 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.

### **CHARTERED RETIREMENT PLANNING COUNSELOR<sup>SM</sup> or CRPC®**

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

### **SERIES 66 REGULATORY EXAM**

The **Uniform Combined State Law Examination** also called the **Series 66** exam is developed by [NASAA](#) and is designed to qualify candidates as both [securities](#) agents and [investment adviser](#) representatives. The Uniform





Combined State Law Examination consists of 100 multiple-choice questions and 10 pretest questions. Applicants are allowed 2½ hours (150 minutes) to complete the examination. The examination is conducted as a closed-book test. Upon completion of the examination, the score for each section and the overall test score will be processed by [Financial Industry Regulatory Authority](#) headquarters and made available to the candidate's sponsor. A score of at least 73% on the Series 66 exam is needed to pass and become eligible for registration as a Registered Investment Adviser Representative. Prior to July 1, 2016, candidates had to attain scores of 75% in order to pass and prior to January 1, 2010, candidates had to attain scores of 71% in order to pass.

## Gabriel Lewis Medina, of BCC (CRD# 5319460)

**Year of Birth: 1978**

**Educational Background:**

- 2001-2005 – Bachelors, Business Administration - Concentration in Finance, Cal State University, Fresno

**Business Experience:**

- 07/01/2021 – Present, Bridge Capital Consulting, LLC, Investment Advisor Representative
- 04/2018 – 06/2021, Gies Associates, LLC, Registered Rep
- 04/2011 – 06/2021, United Planners Financial Services, Registered Rep
- 02/2019 – Present, 142<sup>nd</sup> Fighter Wing Oregon Air National Guard, Education & Training Management
- 01/2000 – 02/2019, California Air National Guard (Guard Duty), Training Management
- 06/2011 – 03/2018, Financial & Estate Advisor, Investor Advisor Rep/Agent
- 03/2010 – 05/2011, Chase Investment Services Corp, Financial Advisor
- 01/2008 – 03/2010, Wells Fargo Advisors, LLC, Financial Advisor
- 06/2007 – 01/2008, A.G. Edwards & Sons, Financial Advisor

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### **Outside Business Activities**

Daniel Anthony Pichardo is not involved with outside business activities.

Gabriel Lewis Medina - 02/2019 – Present, 142<sup>nd</sup> Fighter Wing Oregon Air National Guard, Education & Training Management.

### **Performance Based Fees**

We do not offer performance-based fees.

### **Material Disciplinary Disclosures**

No management person at Bridge Capital Consulting, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### **Material Relationships That Management Persons Have with Issuers of Securities**

No management person at Bridge Capital Consulting, LLC has any relationship or arrangement with issuers of securities.

### **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**

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



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## ITEM 1: COVER PAGE – BROCHURE SUPPLEMENT

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**Bridge Capital Consulting, LLC**

**DBA: “Bridge Financial Management”**

4343 Von Karman Ave, Suite 250L

Newport Beach, CA 92660

Contact: Daniel A. Pichardo, CRPC®, CFP®, Chief Compliance Officer

DPichardo@myBridgeCapital.com

(949) 229-2262

www.BridgeCapitalConsulting.com

**Form ADV Part 2B – Firm Brochure Supplement**

**March 7, 2023**

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This brochure supplement provides information about Daniel Anthony Pichardo that supplements the Bridge Capital Consulting, LLC (“BCC”) brochure. A copy of that brochure precedes this supplement. Please contact Daniel Anthony Pichardo if the BCC brochure is not included with this supplement or if you have any questions about the contents of this supplement. Additional information about Daniel Anthony Pichardo is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Bridge Capital Consulting, LLC is registered as an Investment Adviser with the State of California. Registration of an Investment Adviser does not imply any level of skill or training. Additional information about BCC is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 283663.



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## ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

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**Gabriel Lewis Medina, of BCC (CRD# 5319460)**

**Year of Birth: 1978**

**Educational Background:**

- 2001-2005 – Bachelors, Business Administration - Concentration in Finance, Cal State University, Fresno

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## ITEM 3: DISCIPLINARY INFORMATION

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No management person at Bridge Capital Consulting, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

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## ITEM 4: OTHER BUSINESS ACTIVITIES

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Gabriel Lewis Medina - 02/2019 – Present, 142<sup>nd</sup> Fighter Wing Oregon Air National Guard, Education & Training Management

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## ITEM 5: ADDITIONAL COMPENSATION

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No management person at Bridge Capital Consulting, LLC receives any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through BCC.

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## ITEM 6: SUPERVISION

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Daniel Anthony Pichardo, as President and Chief Compliance Officer of BCC, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.



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## ITEM 7: REQUIREMENTS FOR STATE REGISTERED ADVISERS

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The management people at Bridge Capital Consulting, LLC have NOT been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.





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## PRIVACY POLICY

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**Bridge Capital Consulting, LLC**

**DBA: “Bridge Financial Management”**

4343 Von Karman Ave, Suite 250L

Newport Beach, CA 92660

Contact: Daniel A. Pichardo, CRPC®, CFP®, Chief Compliance Officer

DPichardo@myBridgeCapital.com

(949) 229-2262

www.BridgeCapitalConsulting.com

**March 7, 2023**

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Bridge Capital Consulting, LLC recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Bridge Capital Consulting, LLC will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. Bridge Capital Consulting, LLC will provide the privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect it responsibly.

### Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

### What Information We Collect and Maintain



We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

#### What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our clearing firm. If the Financial Planner/Financial Adviser leaves Bridge Capital Consulting, LLC to join another firm, he or she may be permitted to retain copies of client information so that they can assist with the transfer of client accounts and continue to serve the client at their new firm.

“Opting-Out” of Third-Party Disclosures: If you do not want your Financial Planner/Financial Adviser to retain copies of your client sensitive information when he or she leaves us to join another firm, you may contact us by calling (949) 229-2262.

Otherwise, Bridge Capital Consulting, LLC will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies not affiliated with Bridge Capital Consulting, LLC will be subject to confidentiality agreements.

#### How We Protect Your Personal Information

Privacy has always been important to Bridge Capital Consulting, LLC. We restrict and limit access to client information only to those who need to carry out their business functions. We educate employees about safeguarding client information and preventing its unauthorized access, disclosure, or use. Employees will be required to acknowledge their acceptance and understanding of the privacy policy in writing. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information.